



# Bash 500MW Wind Farm

## Republic of Uzbekistan



Summary of Material  
Updates to the ESIA  
Package

Prepared for:



September 2022

## DOCUMENT INFORMATION

|                      |   |
|----------------------|---|
| PROJECT NAME         | Bash 500MW Wind Farm                            |
| 5Cs PROJECT NUMBER   | 1305/001/100                                    |
| DOCUMENT TITLE       | Summary of Material Updates to the ESIA Package |
| CLIENT               | ACWA Power                                      |
| 5Cs PROJECT MANAGER  | Eva Muthoni Oberholzer                          |
| 5Cs PROJECT DIRECTOR | Ken Wade  |

## DOCUMENT CONTROL

| VERSION | VERSION DATE | DESCRIPTION                                     | AUTHOR  | REVIEWER | APPROVER |
|---------|--------------|---|---------|----------|----------|
| 1.0     | 16/09/2022   | Summary of Material Updates to the ESIA Package | EFO/EMO | MKB      | KRW      |
| 1.1     | 26/09/2022   | Update based on comments received from EBRD     | EMO     | MKB      | KRW      |



|   |                      |   |
|---|----------------------|---|
| 1 | Financial Capital    | Regardless of location, mode of delivery or function, all organisations are dependent on <i>The 5 Capitals of Sustainable Development</i> to enable long term delivery of its products or services. |
| 2 | Social Capital       |   |
| 3 | Natural Capital      |   |
| 4 | Manufactured Capital |   |
| 5 | Human Capital        | Sustainability is at the heart of everything that 5 Capitals achieves. Wherever we work, we strive to provide our clients with the means to maintain and enhance these stocks of capital assets.    |

## DISCLAIMER

5 Capitals cannot accept responsibility for the consequences of this document being relied upon by any other party, or being used for any other purpose.

This document contains confidential information and proprietary intellectual property. It should not be shown to other parties without consent from the party which commissioned it.

This document is issued for the party which commissioned it and for specific purposes connected with the above-identified project only. It should not be relied upon by any other party or used for any other purpose

---

## CONTENTS

|     |                                      |    |
|-----|--------------------------------------|----|
| 1   | INTRODUCTION                         | 1  |
| 1.1 | Purpose of this Document             | 1  |
| 1.2 | Related Documents                    | 2  |
| 2   | MATERIAL CHANGES TO THE ESIA PACKAGE | 4  |
| 2.1 | ESIA                                 | 4  |
| 2.2 | Critical Habitat Assessment (CHA)    | 35 |
| 2.3 | Resettlement Action Plan (RAP)       | 45 |
| 2.4 | Stakeholder Engagement Plan (SEP)    | 52 |
| 3   | CONCLUSIONS                          | 54 |

---

## TABLES

|   |    |
|---|----|
| Table 1-1 Website Links to Disclosed ESIA Documents .....   | 3  |
| Table 2-1 Material Changes to ESIA Volume 2 (Main Text, Tables & Figures) ....                      | 5  |
| Table 2-2 Material Changes to ESIA Volume 3 (Framework for Environmental & Social Management) ..... | 34 |
| Table 2-3 Material Changes to CHA Stage 1 .....   | 35 |
| Table 2-4 Material Changes to CHA Stage 3 .....   | 36 |

## LIST OF ABBREVIATIONS

| ABBREVIATION | MEANING  |
|--------------|--|
| ADB          | Asian development Bank                             |
| DFIs         | Development Finance Institutions                   |
| E&S          | Environmental & Social                             |
| ESIA         | Environmental and Social Impact Assessment         |
| MIGA         | Multilateral Investment Guarantee Agency           |
| OHTL         | Over Head Transmission Line                        |
| PAPs         | Project Affected Persons                           |
| RAP          | Resettlement Action Plan                           |
| SEP          | Stakeholder Engagement Plan                        |
| WF           | Wind Farm  |
| WTG          | Wind Turbine Generator                             |
| 5 Capitals   | 5 Capitals Environmental and Management Consulting |

# 1 INTRODUCTION

ACWA Power has signed an implementation agreement with the Ministry of Energy in Uzbekistan, as part of the Uzbekistan 2030 Energy Strategy, for developing, building and operating a 500MW Wind Farm in Bash and the construction of the Bash-Karakul 165km OHTL (herein after referred to as 'the Project').

ACWA Power are seeking an amount of project finance from financial Institutions who have their own internal environmental & social investment policies/standards, or potentially from lenders who may be members of voluntary agreements such as the Equator Principles. At this stage, it is understood that the European Bank for Reconstruction and Development (EBRD), Asian Development Bank (ADB) and Multilateral Investment Guarantee Agency (MIGA) are involved in discussions relating to provisions of finance (among other DFIs). Additionally, ACWA Power implements the E&S requirements of IFC as a minimum on all its projects and as such, the Bash WF is required to adhere to IFC Performance Standards.

5 Capitals Environmental and Management Consulting (5 Capitals) has been engaged by ACWA Power to undertake the independent EIA and ESIA processes, as well as other environmental & social related scope which includes the disclosure of E&S documents to stakeholders and Project Affected Persons (PAPs).

## 1.1 Purpose of this Document

This document outlines a Summary of Material Updates to the ESIA Package. It has been prepared for the following reasons:

- To present material changes within the ESIA package since the first drafts were disclosed by ADB in March 2022, EBRD in May 2022 and MIGA in July 2022 vs the final versions submitted to the lenders in August 2022 (and to be disclosed by ACWA Power on their website at <https://acwapower.com/en/projects/bash-wind-ipp/>!).
  - These material changes are based on the feedback and comments received from the lenders and their advisers during the review process.
- Meet the requirement of the Project's lenders (EBRD, MIGA, ADB) which require stakeholders to be informed if there are any material changes to the Project such as impacts, proposed mitigations etc.

---

<sup>1</sup> ACWA Power will disclose the updated ESIA package documents on the same website where the reports were disclosed in May 2022.

- Provide a summary of the final ESIA package which will be disclosed on ACWA Power's website for access to all stakeholders.
- To provide an update on the on-going impact assessments such as the Supply Chain Due Diligence.
- To provide an update on the specific Environmental & Social Management Plans that have been prepared during the ESIA disclosure period. These plans include:
  - Post Construction Fatality Monitoring Plan;
  - Breeding Bird Protection Plan;
  - <sup>2</sup>Ecological Chance Procedure which includes:
    - o Biodiversity Chance Find Procedure.
    - o Pre-construction Survey & Relocation Protocol.
  - Flora Conservation Action Plan;
  - Reptile Relocation Plan;
  - Collision Risk Management Plan;
  - Potential Biological Removal;
  - Livestock Management Plan;
  - Biodiversity Action Plan;
  - Biodiversity Management Plan (including the Biodiversity Monitoring & Evaluation Program);
  - Compensation Offset Plan;
  - Offset Feasibility Study;
  - Supply Chain Management Plan; and
  - Other reports prepared for the project include:
    - o ESIA Consultation & Disclosure Report.
    - o Curtailment Calculations.

## 1.2 Related Documents

This report has been prepared based on the updates undertaken in the ESIA package publicly disclosed by the lenders and ACWA Power. The disclosed documents were prepared in English and translated to the following languages:

- **EISA Volume 1, Non-Technical Summary:** English, Russian & Uzbek.
- **EISA Volume 2, Main Report:** English & Russian.
- **EISA Volume 3, Framework for Environmental & Social Management:** English & Russian.
- **EISA Volume 4:** Appendices Part A, B & C: English.

---

<sup>2</sup> The Ecological Chance Procedure, Flora Conservation Action Plan & Reptile Relocation Plan have been prepared and they have been implemented as part of the pre-construction surveys.

---

- **SEP:** English & Russian.
- **RAP:** English, Russian & Uzbek.
- **ESAP:** English & Russian (issued by EBRD).

The disclosure occurred on EBRD's, ADB's, MIGA's and ACWA Power's website as provided in the table below.

**Table 1-1 Website Links to Disclosed ESIA Documents**

| ENTITY            | WEBSITE   | DISCLOSURE TIMELINE |
|-------------------|---|---------------------|
| <b>EBRD</b>       | <a href="https://www.ebrd.com/work-with-us/projects/esia/uzbekistan-bash-wpp.html">https://www.ebrd.com/work-with-us/projects/esia/uzbekistan-bash-wpp.html</a> | May 2022            |
| <b>ADB</b>        | <a href="https://www.adb.org/projects/documents/uzb-56085-001-esia">https://www.adb.org/projects/documents/uzb-56085-001-esia</a>                               | March 2022          |
| <b>MIGA</b>       | <a href="https://www.miga.org/project/bash-wind-farm-project">https://www.miga.org/project/bash-wind-farm-project</a>   | July 2022           |
| <b>ACWA Power</b> | <a href="https://acwapower.com/en/projects/bash-wind-ipp/">https://acwapower.com/en/projects/bash-wind-ipp/</a>   | May 2022            |

---

## 2 MATERIAL CHANGES TO THE ESIA PACKAGE

### 2.1 ESIA

The tables below outline the material changes within the different ESIA reports: mainly Volume 2 and Volume 3. The changes made to Volume 2 have been reflected in volume 1 (NTS) and so to avoid repetition, a summary of material changes to volume 1 have not been outlined herein.

There were no material changes to Volume 4 of the ESIA (Appendices).

**Table 2-1 Material Changes to ESIA Volume 2 (Main Text, Tables & Figures)**

| SECTION  | HEADING        | ORIGINAL TEXT (MARCH2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE  |
|----------|----------------|--|---|---|--|
| 2.2.1.1. | Land Ownership | The Land Allotment Order (see Appendix C) issued to the Project on 19 <sup>th</sup> March 2021, states that "the Deputy Mayor F.Jabbarov and Department of State Cadastre of Gijduvon district (O.Khakimov) should allocate 285.1ha land from state reserve in Baraka community in Gijduvon district for "ACWA Power Bash Wind" LLC construction of wind power plant with a capacity of 500 MW | The Land Allotment Order (see Appendix C) issued to the Project on 19 <sup>th</sup> March 2021, states that "the Deputy Mayor F.Jabbarov and Department of State Cadastre of Gijduvon district (O.Khakimov) should allocate 285.1ha land from state reserve in Baraka community in Gijduvon district for "ACWA Power Bash Wind" LLC construction of wind power plant with a capacity of 500 MW  | The ESIA now includes details of the Presidential Decree of the Republic of Uzbekistan No 314 dated 8 <sup>th</sup> July 2022 which includes a requirement for the Khokimiyat of the Bukhara region to ensure allocation of the land plot to the Ministry of Energy who would in turn ensure transfer of the lease to the Project Company (for the Wind Farm) and National Electric Grid of Uzbekistan – NEGU (for the OHTL).<br>In addition, the Project exact land allocation was provided as 140.9018ha for permanent facilities and 50.65ha for temporary facilities. | <p><b>The Land Allotment Order directive issued on 19<sup>th</sup> March 2021 was superseded by the issuance of the Presidential Decree No 314 dated 8<sup>th</sup> July 2022.</b></p> <p><b>The update shows that the total land allocated to the Project was reduced from 285.1ha to 172.55ha based on the Project footprint (permanent &amp; temporary facilities).</b></p> |
| 2.2.1.2  | Land Leases    | Not Applicable.<br>See next cells for new text added to this section   | The permanent land impact from the Project footprint will only account for 0.059% of the total land owned by the LLC while the temporary impact accounts for 0.007%.  | Based on the Presidential Decree, the permanent land impact based on the land lease issued for the lifetime of the Project, will only impact 0.053% of the land owned by the LLC while temporary impact from the laydown areas will account for 0.0034%.  | <p><b>The assessment (based on the Presidential Decree issued on 8<sup>th</sup> July 2022) shows that the impact on land will be less than initially estimated by the use of the BoP area in the ESIA's disclosed in May/July 2022.</b></p>  |
|          |                | Based on the above summarized consultations, the land lease agreement (LLA) will be signed with Gijduvon municipality as per land allotment orders.<br><br>At this stage it is understood that the form of LLA is ready in English and is currently being translated to Russian. Once translated, discussion with the municipality on the signing of the LLA will commence.                    | <p><b>Land Leases: Signing of the Land Lease</b></p> <p>As such, the land lease agreement will be signed between ACWA Power and Gijduvon municipality as per the land allotment orders. It is understood from the Client that, that SWID have been informed of this decision by the Bukhara Region Khokimiyat. Reference Appendix E for correspondence between Bukhara Regional Khokimiyat, Gijduvon Municipality Mayor and ACWA Power.</p> | <p><b>Land Leases: Signing of the Land Lease</b></p> <p>Based on the Presidential Decree issued on 8<sup>th</sup> July 2022, the Khokimiyat of the Bukhara region will allocate land to the Ministry of Energy who will sign the LLA with the Project Company. As such, ACWA Power/Project company cannot sign the LLA with the municipality or Committee.</p>  | <p><b>This means that the Project Company will sign the land lease agreement for the Wind Farm with the Ministry of Energy and not the Khokimiyat. It is understood that this change has been communicated by the government to the various stakeholders.</b></p>  |
| 2.2.3.1  | Land Lease     | Not Applicable.<br>See next cells for new text added to this section   | As earlier discussed, ACWA Power will transfer the operation of the OHTL to NEGU after completion of the construction phase. As such and  | ACWA Power will transfer the operation of the OHTL to NEGU after completion of the construction phase. As such and  | <b>As above.</b>   |

| SECTION | HEADING                      | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)   | JUSTIFICATION FOR MATERIAL CHANGE   |
|---------|------------------------------|---|---|--|---|
|         |                              |   | <p>the construction phase. As such, ACWA Power will only be granted land usage rights during the construction phase of the OHTL and the required land will be allocated to NEGU on a permanent basis through a government decree. It is understood from the Client that the allocation of land to NEGU will be undertaken once the required land is taken into state reserve. This process is still ongoing.</p>  | <p>in accordance with the Presidential Decree, ACWA Power will be granted with land usage rights and the required land will be allocated to NEGU on a permanent basis by the MoE.</p> <p>According to the Presidential Decree, the OHTL footprint will affect 0.18ha of irrigated land out of the allocated 22.62ha. In order to mitigate against this loss, the Decree states: The Khokimiyat of Bukhara region, by the end of 2022, will ensure the development of new irrigated land plots in an amount equal to ten times the size of irrigated land plots, as well as new agricultural land equal to the area of pasture land, the land category of which is changed in accordance with this resolution</p> |   |
| 2.3.2.2 | <b>Associated Facilities</b> | <p>Not Applicable.</p> <p>See next cell for new text added to this section</p>  | <p>Not Applicable.</p> <p>See next cell for new text added to this section</p>  | <p>Impacts of the Dzhankeldy - Sarymay OHTL have been assessed and relevant reports disclosed on EBRD's website Report on the Navoi-Murantau OHTL have been disclosed on the EBRD's website</p>  | <p><b>This section has been updated to include the link to the reports disclosed on EBRD's website on the associated facilities showing that the risks/impacts of the associated facilities have been assessed and appropriate mitigation and management measures put in place.</b></p>   |
| 2.4.3   | <b>Batching Plant</b>        | <p>It is understood that a concrete batching plant will be located at the wind farm if ready mix concrete will not be sourced for the project. This batching plant will be developed and funded as part of the project. At this stage, the exact location of the batching plant within the project site is unknown. However, it is expected that it will be located at a distance of over 500m from the worker accommodation camp which is also located on site and at a distance of not less than 500m from local communities. This is so as to avoid air quality and noise impacts to the accommodation camp and local communities.</p> | <p>It is understood that a concrete batching plant will be located at the wind farm if ready mix concrete will not be sourced for the project. This batching plant will be developed and funded as part of the project. At this stage, the exact location of the batching plant within the project site is unknown. However, it is expected that it will be located at a distance of over 500m from the worker accommodation camp which is also located on site and at a distance of not less than 500m from local communities. This is so as to avoid air quality and noise impacts to the accommodation camp and local communities.</p> | <p>The concrete batching plant will be located to the south west of the sub-station approximately 270m north east of the railway line. This batching plant will be developed and funded as part of the project. The location of the batching plant ensures a distance of over 500m from the worker accommodation camp which is also located on site and from local communities. This is so as to avoid air quality and noise impacts to the accommodation camp and local communities</p>   | <p><b>This section has been updated to reflect the location of the batching plant within the project site and the assessment on the receptors reassessed. No additional impacts were identified since the batching plant location is still more than 500m from local communities.</b></p> |

| SECTION | HEADING   | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|---|---|---|---|--|
|         |   |   | impacts to the accommodation camp and local communities.  |   |  |
| 2.6     | Project Milestone   | <p><b>LNTP:</b> 1st April 2022<br/> <b>FNTP:</b> 1st July 2022<br/> <b>WTG Installation:</b> 2nd November 2022<br/> <b>Transmission Line Construction:</b> 1st December 2022<br/> <b>Scheduled COD:</b> 31st December 2023<br/> <b>Required Project COD:</b> 31st March 2024</p>  | <p><b>LNTP:</b> 1st April 2022<br/> <b>FNTP:</b> October 2022<br/> <b>WTG Installation:</b> November 2022<br/> <b>Transmission Line Construction:</b> December 2022<br/> <b>Scheduled COD:</b> December 2023<br/> <b>Required Project COD:</b> March 2024</p>   | <p><b>LNTP:</b> July 2022<br/> <b>FNTP:</b> October 2022<br/> <b>WTG Installation:</b> March 2023<br/> <b>Transmission Line Construction:</b> August 2023<br/> <b>Early COD:</b> July 2024<br/> <b>Project COD:</b> December 2024</p>   | <p>The project milestones were updated based on consultations between ACWA Power, NEGU and the Ministry of Energy (among other government stakeholders). In addition, the updated milestones were used to update the Resettlement Action Plan (RAP) implementation timetable.</p>  |
| 7.3.1.1 | Habitat Loss  | <p>Habitat loss impact will be further mitigated by post-construction restoration and compensatory offsets:</p> <ul style="list-style-type: none"> <li>• The EPC contractor will commit to the post-construction restoration of all affected areas to natural habitat conditions. Restore habitat post-construction in unused land areas that are not required for O&amp;M maintenance; and</li> <li>• Compensatory offsets will be applied in adjacent degraded areas to restore and revitalize similar natural habitats subject as the lost habitats.</li> </ul> <p>The above measures will be detailed in the Restoration Action Plan and Compensation Offset Plan respectively.</p> | <p>Habitat loss impact will be further mitigated by post-construction restoration and compensatory offsets:</p> <ul style="list-style-type: none"> <li>• The EPC contractor will commit to the post-construction restoration of all affected areas to natural habitat conditions. Restore habitat post-construction in unused land areas that are not required for O&amp;M maintenance; and</li> <li>• Compensatory offsets will be applied in adjacent degraded areas to restore and revitalize similar natural habitats subject as the lost habitats.</li> </ul> <p>The above measures will be detailed in the Restoration Action Plan and Compensation Offset Plan respectively.</p> | <p>Habitat loss impact will be further mitigated by the following mitigation measures:</p> <ul style="list-style-type: none"> <li>• The EPC contractor will commit to the restoration of habitat post-construction in unused land areas that are not required for O&amp;M maintenance. The Restoration Action Plan will provide the restoration measures that will be undertaken for natural habitats, post-construction restoration via seeding, re-planting, and landscaping with native, high-value species, monitoring and reporting requirements of the plan.</li> </ul> | <p>The Compensation Offset Plan is focused on the compensation/offsets needed to ensure Net Gain is reached for the two species deemed to trigger critical habitat- the Asian Houbara and the Southern Even-fingered Gecko. Therefore, this section has been updated to refer natural habitat loss mitigation to the Restoration Action Plan only.</p> |
| 7.3.1.2 | Biodiversity Loss - Direct Mortality and Lowered Survivorship | <p>The Southern Even-fingered Gecko is a particularly sensitive receptor. Recent DNA analysis indicates that this is a new species within Central Uzbekistan. The limited numbers recorded at the Bash WF may be due to its elusive behaviour or low density of this species on site.</p>   | <p>The Southern Even-fingered Gecko is a particularly sensitive receptor. Recent DNA analysis indicates that this is a new species within Central Uzbekistan. The limited numbers recorded at the Bash WF may be due to its elusive behaviour or low density of this species on site.</p>   | <p>The Southern Even-fingered Gecko is a particularly sensitive receptor. Recent DNA analysis indicates that this is a new species within Central Uzbekistan. The limited numbers recorded at the Bash WF is due to the marginal extent of suitable 'takyr' habitat within the project area.</p>  | <p>This sentence was updated to reflect the explanation of why gecko density was low at the Bash wind site.</p>  |
|         |   | <p>The following mitigation measures will be implemented to reduce the impacts on floral species:</p> <ul style="list-style-type: none"> <li>• Pre-construction survey to carry out in-situ protection where possible for threatened flora;</li> </ul>  | <p>The following mitigation measures will be implemented to reduce the impacts on floral species:</p>   | <p>The following mitigation measures will be implemented to reduce the impacts on floral species:</p>   | <p>This section was updated to reflect the various management plans which have been prepared for the Project.</p>  |

| SECTION | HEADING | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|---------|---|---|---|--|
|         |         | <ul style="list-style-type: none"> <li>Seed-collection of endangered and threatened flora (during the peak season, chiefly March) such as the perennial <i>Tulipa lehmanniana</i> species listed as a category 3 (NT) on the Uzbek RDB.</li> <li>Post-construction restoration via seeding, re-planting, and landscaping with native, high-value species such as the perennial <i>Tulipa lehmanniana</i> species listed as a category 3 (NT) on the Uzbek RDB.</li> <li>Compensatory measures for removal of any saxaul trees as per National Regulatory requirements.</li> </ul>   | <ul style="list-style-type: none"> <li>Pre-construction survey to carry out in-situ protection where possible for threatened flora;</li> <li>Seed-collection of endangered and threatened flora (during the peak season, chiefly March) such as the perennial <i>Tulipa lehmanniana</i> species listed as a category 3 (NT) on the Uzbek RDB.</li> <li>Post-construction restoration via seeding, re-planting, and landscaping with native, high-value species such as the perennial <i>Tulipa lehmanniana</i> species listed as a category 3 (NT) on the Uzbek RDB.</li> <li>Compensatory measures for removal of any saxaul trees as per National Regulatory requirements.</li> </ul>   | <ul style="list-style-type: none"> <li>As part of the Biodiversity Management Program (BMP), a Flora Conservation Action Plan has been prepared, which outlines the locations, timings and methodology of pre-construction flora surveys to be undertaken for the purposes of seed collection, seed storage, demarcation of areas to be protected, and translocation of whole specimens if deemed feasible for endangered and threatened flora during appropriate season.</li> <li>The EPC contractor will commit to the restoration of habitat post-construction in unused land areas that are not required for O&amp;M maintenance. The Restoration Action Plan will provide the restoration measures that will be undertaken for natural habitats, post-construction restoration via seeding, re-planting, and landscaping with native, high-value species, monitoring and reporting requirements of the plan.</li> </ul>  | <p><b>Plans such as the Chance Find Procedure, Reptile Relocation Plan, Flora Conservation Action Plan have been implemented as part of the pre-construction survey requirements for the project.</b></p> <p><b>In addition, vol 3 of the ESIA provides a timeline for when the Restoration Action Plan will require to be prepared and implemented.</b></p>   |
|         |         | <p>The following mitigation measures will be implemented to reduce the impacts on fauna species:</p> <ul style="list-style-type: none"> <li>Minimization of the built footprint in design and minimise the construction buffer zone outside of the prime suitable habitat for Southern Even-fingered Gecko as much as possible (see below for further details);</li> <li>Setting aside protected reserve areas dedicated for the Southern Even-fingered Gecko; (see below for further details);</li> <li>Prior to start of construction, relocation of any Southern Even-fingered Gecko, Russian Tortoise, and Sand Boa; pre-construction survey (during active period, not during hibernation) to suitable release sites. The methodology, timing and scope is detailed in a Reptile Relocation Plan;</li> <li>Full-time Ecologist as part of EPC contractor team to be on site throughout all construction works from the time of LNTP, inclusive of all early site preparation works, and throughout the entirety of the construction period.</li> <li>Chance Find Procedure will be included within the CESMP to provide general guidance on potential ecological triggers for work stoppage and will be implemented by the Ecologist and EPC contractor team; and</li> <li>Post-construction habitat restoration, especially suitable habitat for Southern Even-fingered Gecko;</li> </ul> | <p>The following mitigation measures will be implemented to reduce the impacts on fauna species:</p> <ul style="list-style-type: none"> <li>Minimization of the built footprint in design and minimise the construction buffer zone outside of the prime suitable habitat for Southern Even-fingered Gecko as much as possible (see below for further details);</li> <li>Setting aside protected reserve areas dedicated for the Southern Even-fingered Gecko; (see below for further details);</li> <li>Prior to start of construction, relocation of any Southern Even-fingered Gecko, Russian Tortoise, and Sand Boa; pre-construction survey (during active period, not during hibernation) to suitable release sites. The methodology, timing and scope is detailed in a Reptile Relocation Plan;</li> <li>Full-time Ecologist as part of EPC contractor team to be on site throughout all construction works from the time of LNTP, inclusive of all early site preparation works, and throughout the entirety of the construction period.</li> <li>Chance Find Procedure will be included within the CESMP to provide general guidance on potential ecological triggers for work stoppage and will be implemented by the Ecologist and EPC contractor team; and</li> <li>Post-construction habitat restoration, especially suitable habitat for Southern Even-fingered Gecko;</li> </ul> | <p>The following mitigation measures will be implemented to reduce the impacts on fauna species:</p> <ul style="list-style-type: none"> <li>Minimization of the built footprint in design and minimise the construction buffer zone outside of the prime suitable habitat for Southern Even-fingered Gecko as much as possible (see below for further details);</li> <li>Setting aside protected reserve areas dedicated for the Southern Even-fingered Gecko; (see below for further details);</li> <li>Prior to start of construction, relocation of any Southern Even-fingered Gecko, Russian Tortoise, and Sand Boa; pre-construction survey (during active period, not during hibernation) to suitable release sites. The methodology, timing and scope is detailed in a Reptile Relocation Plan;</li> <li>Full-time Ecologist as part of EPC contractor team to be on site throughout all construction works from the time of LNTP, inclusive of all early site preparation works, and throughout the entirety of the construction period.</li> <li>Chance Find Procedure will be included within the CESMP to provide general guidance on potential ecological triggers for work stoppage and will be implemented by the Ecologist and EPC contractor team; and</li> <li>Post-construction habitat restoration, especially suitable habitat for Southern Even-fingered Gecko;</li> </ul> | <p><b>The only material change here is the removal of the mention of a reserve for Southern Even-fingered Gecko. It was deemed more prudent to remove compensation/offset measures from the ESIA in preference to provide a detailed Compensation Offset Plan which looks specifically at the Net Gain requirement for critical species. However, the remaining mitigation measures are still in place, but reorganized to account for new management plan(s) that are/will be in place. Plans that have been prepared to include:</b></p> <ul style="list-style-type: none"> <li>-Reptile Relocation Plan</li> <li>- Chance Find Procedure</li> <li>- Biodiversity Action Plan</li> <li>-Compensation Offset Plan.</li> </ul> |

| SECTION | HEADING                    | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|----------------------------|--|---|---|--|
|         |                            |  | <p>hibernation) to suitable release sites. The methodology, timing and scope is detailed in a Reptile Relocation Plan;</p> <ul style="list-style-type: none"> <li>• Full-time Ecologist as part of EPC contractor team to be on site throughout all construction works from the time of LNTP, inclusive of all early site preparation works, and throughout the entirety of the construction period.</li> <li>• Chance Find Procedure will be included within the CESMP to provide general guidance on potential ecological triggers for work stoppage and will be implemented by the Ecologist and EPC contractor team; and</li> <li>• Post-construction habitat restoration, especially suitable habitat for Southern Even-fingered Gecko;</li> </ul> | <p>well as assigned roles and responsibilities. Full-time Ecologist as part of EPC contractor team to be on site throughout all construction works from the time of LNTP, inclusive of all early site preparation works, and throughout the entirety of the construction period.</p> <ul style="list-style-type: none"> <li>• Chance Find Procedure has been included within the CESMP to provide general guidance on potential ecological triggers for work stoppage and will be implemented by the Ecologist and EPC contractor team. For non-threatened species such as other herptiles, rodents, and invertebrates, chance-find procedures with individual relocations as deemed necessary may be sufficient;</li> <li>• The Biodiversity Action Plan (BAP) provides the strategy designed to achieve Net Gain (NG) for the Southern Even-fingered Gecko and No Net Loss (NNL) for the Russian Tortoise</li> <li>• Compensation Offset Plan has been prepared which details the measures that will be implemented to offset gecko loss, if any, and achieve NG</li> </ul> | <p>In addition, the Chance Find Procedure and Reptile Relocation Plan have been implemented during the pre-construction surveys undertaken at the project site</p>   |
|         |                            | No changes made to the section/text. See next cell for text added to this section  | No changes made to the section/text. See next cell for text added to this section   | Added a figure showing the extent of Gecko Critical Habitat in Bash Wind Farm   | <p>This section has been updated to include a map showing the critical habitat in relation to the project site and project facilities. This demonstrated that construction activities are not anticipated to directly impact the population of the Southern Even Fingered Gecko.</p> |
| 7.3.1.2 | <b>General Disturbance</b> | <ul style="list-style-type: none"> <li>• Minimize construction footprint buffer zones and temporary laydown areas.</li> <li>• Minimize duration of construction period avoiding most sensitive months/ seasons (e.g. bird breeding season) where possible.</li> </ul> <p>- Houbara Bustard breeding seasons begins in mid-March and lasts until the end of July.</p> <p>- Egyptian Vulture's breeding season occurs during summer months (April to July).</p> <ul style="list-style-type: none"> <li>• The pre-construction biodiversity management program will include a Breeding Birds Protection Plan, which will provide detailed timings,</li> </ul> | <ul style="list-style-type: none"> <li>• Minimize construction footprint buffer zones and temporary laydown areas.</li> <li>• Minimize duration of construction period avoiding most sensitive months/ seasons (e.g. bird breeding season) where possible.</li> </ul> <p>- Houbara Bustard breeding</p>   | <ul style="list-style-type: none"> <li>• Minimize construction footprint buffer zones and temporary laydown areas.</li> <li>• A Breeding Bird Protection Plan has been prepared which provides the protection measures and protocols i.e., micrositing of turbines within close proximity to raptor nests and buffers to be implemented</li> </ul>  | <p>Particular details have been removed to simplify the text. The Breeding Bird Protection Plan has all scenarios and buffers outlined as well as the justification/rationale for those buffers.</p>   |

| SECTION | HEADING                             | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)   | JUSTIFICATION FOR MATERIAL CHANGE |
|---------|-------------------------------------|--|--|--|-----------------------------------|
|         |                                     | <p>scope and methodology for pre-construction nest-searching in the appropriate seasons and locations; nests for target species will be protected in-situ and no construction works will be allowed throughout the duration of the breeding season within 500m of the nests.</p> <ul style="list-style-type: none"> <li>• In addition, the erection of turbines will not be undertaken for any WTGs within 750m of active Tier 1 nests and would be delayed until the nests have been vacated.</li> <li>• Restore temporary laydown areas and buffer zones post construction with native vegetation and re-seeding with native flora. The detailed methodology for timing, scope, and methods will be prepared in the Restoration Action Plan</li> </ul>   | <p>seasons begins in mid-March and lasts until the end of July.</p> <ul style="list-style-type: none"> <li>- Egyptian Vulture's breeding season occurs during summer months (April to July).</li> <li>• The Breeding Birds Protection Plan, which will provide detailed timings, scope and methodology for pre-construction nest-searching in the appropriate seasons and locations; nests for target species will be protected in-situ and no construction works will be allowed throughout the duration of the breeding season within 500m of the nests.</li> <li>• In addition, the erection of turbines will not be undertaken for any WTGs within 750m of active Tier 1 nests and would be delayed until the nests have been vacated.</li> <li>• Restore temporary laydown areas and buffer zones post construction with native vegetation and re-seeding with native flora. The detailed methodology for timing, scope, and methods will be prepared in the Restoration Action Plan</li> </ul> | <p>at known nest locations based on species sensitivity. The plan also outlines the monitoring and reporting requirements of the construction phase as well as the assigned roles and responsibilities of the involved entities.</p> <ul style="list-style-type: none"> <li>• The Restoration Action Plan provides the restoration measures that will be undertaken for natural habitats, post-construction restoration of temporary laydown areas and buffer zones via seeding, re-planting, and landscaping with native, high-value species, monitoring and reporting requirements of the plan as well assigned roles and responsibilities.</li> </ul>   |                                   |
| 7.3.1.5 | <b>Environmental Quality: Noise</b> | <ul style="list-style-type: none"> <li>• Refer to noise control measures.</li> <li>• Minimize noise during sensitive months/ seasons (e.g. bird breeding season):</li> <li>- Houbara Bustard breeding seasons begins in mid-March and lasts until the end of July.</li> <li>- Egyptian Vulture's breeding season occurs during summer months (April to July).</li> <li>• The Breeding Birds Protection Plan, details the timings, scope and methodology for pre-construction nest-searching in the appropriate seasons and locations; nests for target species will be protected in-situ and no construction works will be allowed throughout the duration of the breeding season within 500m of the nests. Noise barriers, if deemed applicable, will be erected if required to ensure breeding birds are not impacted by excessive noise.</li> <li>• In addition, the erection of turbines will not be undertaken for any WTGs within 750m of active Tier 1 nests and would be delayed until the nests have been vacated.</li> <li>• Use of acoustic barriers, dampening, best available technology</li> </ul> | <ul style="list-style-type: none"> <li>• Refer to noise control measures.</li> <li>• Minimize noise during sensitive months/ seasons (e.g. bird breeding season):</li> <li>- Houbara Bustard breeding seasons begins in mid-March and lasts until the end of July.</li> <li>- Egyptian Vulture's breeding season occurs during summer months (April to July).</li> <li>• The Breeding Birds Protection Plan, details the timings, scope and methodology for pre-construction nest-searching in the appropriate seasons and locations; nests for target species will be protected in-situ and no construction works will be allowed throughout the duration of the breeding season within 500m of the nests. Noise barriers, if deemed applicable, will be erected if required to ensure breeding birds are not impacted by excessive noise.</li> <li>• Use of acoustic barriers, dampening, best available technology</li> </ul>   | <ul style="list-style-type: none"> <li>• Refer to noise control measures.</li> <li>• A Breeding Bird Protection Plan has been prepared which provides the protection measures and protocols i.e., buffers to be implemented at known nest locations based on species sensitivity. The plan also outlines the monitoring and reporting requirements of the construction phase as well as the assigned roles and responsibilities of the involved entities.</li> <li>• Use of acoustic barriers, dampening, best available technology within construction</li> </ul> <p><b>Particular details have been removed to simplify the text. The Breeding Bird Protection Plan has all scenarios and buffers outlined as well as the justification/rationale for those buffers.</b></p> |                                   |

| SECTION | HEADING   | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|---|--|--|---|--|
|         |   | within construction methodology to reduce noise and vibration as much as possible. Intermittent noise is less desirable than continuous noise as it does not allow for habituation   | <p>in the appropriate seasons and locations; nests for target species will be protected in-situ and no construction works will be allowed throughout the duration of the breeding season within 500m of the nests. Noise barriers, if deemed applicable, will be erected if required to ensure breeding birds are not impacted by excessive noise.</p> <ul style="list-style-type: none"> <li>• In addition, the erection of turbines will not be undertaken for any WTGs within 750m of active Tier 1 nests and would be delayed until the nests have been vacated.</li> <li>• Use of acoustic barriers, dampening, best available technology within construction methodology to reduce noise and vibration as much as possible. Intermittent noise is less desirable than continuous noise as it does not allow for habituation</li> </ul> | methodology to reduce noise and vibration as much as possible. Intermittent noise is less desirable than continuous noise as it does not allow for habituation.   |  |
|         | <b>Environmental Quality: Soil</b>  | <ul style="list-style-type: none"> <li>• Minimize construction footprint and strict controls to prevent driving out of designated corridors</li> <li>• Restore buffer zones post – construction and</li> <li>• Habitat restoration post-construction inclusive of topsoil replacement if beneficial or soil tilling were deemed necessary to promote regrowth</li> </ul>   | <ul style="list-style-type: none"> <li>• Minimize construction footprint and strict controls to prevent driving out of designated corridors</li> <li>• Restore buffer zones post – construction and</li> <li>• Habitat restoration post-construction inclusive of topsoil replacement if beneficial or soil tilling were deemed necessary to promote regrowth</li> </ul>   | <ul style="list-style-type: none"> <li>• Minimize construction footprint and strict controls to prevent driving out of designated corridors</li> <li>• The Restoration Action Plan provides the restoration measures that will be undertaken where appropriate, post-construction restoration of temporary laydown areas and buffer zones via seeding, re-planting, and landscaping with native, high-value species, monitoring and reporting requirements of the plan as well assigned roles and responsibilities</li> </ul> | <p><b>This section has been updated to reflect the requirement of a Restoration Action Plan which will be prepared and implemented post-construction.</b></p>  |
| 7.3.2.2 | <b>Biodiversity Loss - Direct Mortality and Lowered Survivorship: Turbine Collision</b> | • Post-construction biodiversity management program will include a Post Construction Fatality Monitoring Plan; detailed and intensive carcass searches will take place throughout the wind farm. Best international practice will be followed in determining the appropriate level of search efforts as well as formulas for searcher-bias adjustments. The Post-construction Fatality Monitoring Program will be continued for up to 5 years or until the risk to birds is considered | • Post-construction biodiversity management program will include a Post Construction Fatality Monitoring Plan; detailed and intensive carcass searches will take place   | • The Post-construction Biodiversity Management Program (BMP) includes a Post Construction Fatality Monitoring Plan (PCFM) which will entail detailed and intensive carcass searches will take place  | <p><b>This section has been updated to reflect the management plans required for the project. In addition, the PCFM, CRMP, PBRs, BAP and the Compensation Offset Plans have already been prepared.</b></p> |

| SECTION | HEADING | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)   | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|---------|--|---|--|--|
|         |         | <p>'negligible' in consultation with the lenders;</p> <ul style="list-style-type: none"> <li>• Thresholds will be established for acceptable levels of annual losses, which will be determined on a species-specific basis via the principles of Potential Biological Removal. Should the Fatality Monitoring prove that thresholds for any particular species are reached, this will trigger an upscaling of mitigation. These thresholds will be developed in the Collision Risk Management Plan.</li> <li>• The Collision Risk Management Plan will include all operational measures that can be implemented to reduce collision risk. This plan will include a detailed Shut-down on Demand (SDOD) Program, wherein turbines are shut-down and prevented from moving, allowing birds to pass through the area safely. SDOD can be detection-led (via observer, automated imaging, thermal or radar systems) or conditional upon seasonal and meteorological conditions. Furthermore, shut down triggers can be manual (via operator) or automatic (via the SCADIS). The exact mechanism for proposed SDOD is being deliberated and developed by the project proponent in discussions with financial lenders and lenders technical</li> </ul> | <p>throughout the wind farm. Best international practice will be followed in determining the appropriate level of search efforts as well as formulas for searcher-bias adjustments. The Post-construction Fatality Monitoring Program will be continued for up to 5 years or until the risk to birds is considered 'negligible' in consultation with the lenders;</p> <ul style="list-style-type: none"> <li>• Thresholds will be established for acceptable levels of annual losses, which will be determined on a species-specific basis via the principles of Potential Biological Removal. Should the Fatality Monitoring prove that thresholds for any particular species are reached, this will trigger an upscaling of mitigation. These thresholds will be developed in the Collision Risk Management Plan.</li> <li>• The Collision Risk Management Plan will include all operational measures that can be implemented to reduce collision risk. This plan will include a detailed Shut-down on Demand (SDOD) Program, wherein turbines are shut-down and prevented from moving, allowing birds to pass through the area safely. SDOD can be detection-led (via observer, automated imaging, thermal or radar systems) or conditional upon seasonal and meteorological conditions. Furthermore, shut down triggers can be manual (via operator) or automatic (via the SCADIS). The exact mechanism for proposed SDOD is being deliberated and developed by the project proponent in</li> </ul> | <p>throughout the wind farm. Best international practice will be followed in determining the appropriate level of search efforts as well as formulas for searcher-bias adjustments. The Post-construction Fatality Monitoring Program will be continued for up to 5 years or until the risk to birds is considered 'negligible' in consultation with the lenders;</p> <ul style="list-style-type: none"> <li>• A Potential Biological Removal Analysis (PBR) was undertaken to determine the thresholds for acceptable levels of annual losses. Should the PCFM prove that thresholds for any particular species are reached, this will trigger an upscaling of mitigation as provided in the Collision Risk Management Plan (CRMP).</li> <li>• The Collision Risk Management Plan provides details of the automated Shut-Down On Demand (SDOD) system, Identiflight, and shut-down protocols that will be implemented at the project site. The plan details process of the Adaptive Management that will be implemented as necessary, roles and responsibilities of entities involved as well as the resourcing requirements to fulfil the management protocols outlined the CRMP.</li> <li>• The Biodiversity Action Plan (BAP) provides the strategy for No Net Loss (NNL) for PBF species and Net Gain (NG) for the CH species, Asian Houbara.</li> <li>• The Compensation Offset Plan details the offset measures that will be implemented for the Asian Houbara if the PCFM exceeds the PBR thresholds.</li> </ul> | <p><b>In addition, the Project will implement a site wide SDOD system (through use of Identiflight) in accordance with the CRMP.</b></p> |

| SECTION | HEADING  | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE |
|---------|--|---|--|---|-----------------------------------|
|         |  |   | discussions with financial lenders and lenders technical   |   |                                   |
| 7.3.2.2 | <b>Biodiversity Loss - Direct Mortality and Lowered Survivorship: Mitigation for Nesting Birds</b> | <ul style="list-style-type: none"> <li>Despite the low predicted numbers of collision risk, the presence of nesting raptors, including species of conservation concern within the project area deserve further consideration in relation to the potential risk of collision with operating wind turbines. Further, nest desertion is a concern as a result of the disturbance from operating wind turbines. Although raptor nest searches have been conducted during baseline surveys, a detailed breeding bird and raptor nest surveying effort will be conducted beginning in Spring 2022 and continuing throughout the relevant nesting period for species of concern, namely, Egyptian Vulture. The results of the nesting surveys will be used to develop the criteria for the proposed backup SDOD program in relation to turbines that may be an increased risk for breeding birds.</li> <li>A 750m buffer will be implemented for all known nests of Tier 1 species. All WTGs located within 750m of nest sites will be microsited to ensure a 750m buffer is maintained for Tier 1 species nest sites.</li> <li>Two turbines, BAS59 and BAS60 were located within 750 m of a known nest (Egyptian Vulture May; 2021) recorded during the baseline surveys. These two WTGs were microsited to ensure a 750m buffer from the nest. The following figure shows the old location (yellow markers) and new locations (blue markers) of the microsited turbines</li> </ul> | <ul style="list-style-type: none"> <li>Despite the low predicted numbers of collision risk, the presence of nesting raptors, including species of conservation concern within the project area deserve further consideration in relation to the potential risk of collision with operating wind turbines. Further, nest desertion is a concern as a result of the disturbance from operating wind turbines. Although raptor nest searches have been conducted during baseline surveys, a detailed breeding bird and raptor nest surveying effort will be conducted beginning in Spring 2022 and continuing throughout the relevant nesting period for species of concern, namely, Egyptian Vulture. The results of the nesting surveys will be used to develop the criteria for the proposed backup SDOD program in relation to turbines that may be an increased risk for breeding birds.</li> <li>A 750m buffer will be implemented for all known nests of Tier 1 species. All WTGs located within 750m of nest sites will be microsited to ensure a 750m buffer is maintained for Tier 1 species nest sites.</li> <li>Two turbines, BAS59 and BAS60 were located within 750 m of a known nest (Egyptian Vulture May; 2021) recorded during the baseline surveys. These two WTGs were microsited to ensure a 750m buffer from the nest. The following figure shows the old location (yellow markers) and new locations (blue markers) of the microsited turbines</li> </ul> <ul style="list-style-type: none"> <li>A Breeding Bird Protection Plan has been prepared which provides the protection measures and protocols such as micrositing of turbines within close proximity to raptor nests.</li> <li>Two turbines, BAS59 and BAS60 were located within 750 m of a known nest (Egyptian Vulture May; 2021) recorded during the baseline surveys. These two WTGs were microsited to ensure a 750m buffer from the nest. The following figure shows the old location (yellow markers) and new locations (blue markers) of the microsited turbines</li> <li>Turbine BAS-62 was located within 750m of an active Eastern Imperial Eagle recorded during the Spring 2022 nesting surveys. This turbine has been microsited to ensure the 750m buffer is maintained from the nest. The following figure shows the location of the nest, old location (yellow marker) and new location (blue marker) of the microsited turbine.</li> <li>The turbine BAS-70 was located 720 m from an active Golden Eagle nest recorded during the nesting surveys. This turbine has been microsited to ensure a 750m buffer is maintained from the nest. The following figure shows the old location (yellow marker) and new location (blue marker) of the microsited turbine.</li> </ul> | <p><b>This section has been updated to include the exact micrositing details which have been confirmed and will be implemented by the Project to ensure a buffer of 750m is maintained.</b></p> <p><b>The Breeding Bird Protection Plan has also been prepared for implementation by the project.</b></p> |                                   |

| SECTION | HEADING  | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE   |
|---------|--|---|--|---|---|
|         |  |   | locations (blue markers) of the microsited turbines  |   |   |
| 7.3.2.2 | <b>Biodiversity Loss - Direct Mortality and Lowered Survivorship: Mitigation for Birds Using Ayakagitma Lake</b> | Not Applicable.<br>See next cell for new text added to this section   | If Tier 1 species are impacted by the remaining turbines in the WF area, mitigation will be upscaled as per the Contingency Plan detailed in the Collision Risk Management Plan.   | If required, mitigation will be upscaled as per the Adaptive Mitigation detailed in the Collision Risk Management Plan.   | <b>The project will be required to implement the mitigation and management measures detailed in the CRMP which has been prepared for the Project.</b>   |
|         |  | Not Applicable.<br>See next cell for new text added to this section   | Not Applicable.<br>See next cell for new text added to this section  | A 2km buffer will be implemented between the lake and the nearest WTGs. Three WTGs (BAS50,BAS51 & BAS52) were microsited out of the 2km buffer.<br><br>During the impact assessment and formulation of the mitigation strategy for bird turbine collision, the measure of painting a single turbine blade black for all WTG's was included in the previous version of this ESIA. Following discussions with the supplier and project proponent it was deemed that this measure would not be financially viable to the project<br><b>See Table 7-45.</b> | <b>3 WTGs were microsited out of the 2km buffer zone established between Lake Ayakagitma and the nearest WTG.</b><br><br><b>A table has been provided in the ESIA to outline the rationale behind the exclusion of painting the turbine blade from the mitigation strategy as this would not be financially viable and poses some performance impact.</b> |
| 7.3.2.2 | <b>Biodiversity Loss - Turbine Collision (Bats)</b>  | The following mitigation measures will be implemented to reduce collision risk:<br><br><ul style="list-style-type: none"> <li>Bright white or bluish lights (mercury vapor, white incandescent and white fluorescent) are the most attractive to insects. Yellowish, pinkish, or orange (sodium vapor, halogen, dichroic yellow) are the least attractive to most insects. LED bulbs are less attractive because they produce low heat and long wavelengths of light as well as little or no ultraviolet radiation.</li> <li>Post-construction biodiversity management program will include a Post Construction Fatality Monitoring Plan; detailed and intensive carcass searches will take place throughout the wind farm</li> <li>Thresholds will be established for acceptable levels of annual losses, which will be determined on a species-specific basis via the principles of Potential Biological Removal. Should the Fatality Monitoring prove that thresholds for any particular species are reached, this will trigger an upscaling of mitigation. These thresholds will be developed in the Collision Risk Management Plan.</li> <li>The Collision Risk Management Plan will include all operational measures that can be implemented to reduce collision risk. This plan will include a detailed Cut-in Curtailment Program, wherein turbines are shut-down and prevented from moving, during periods of high bat activity</li> </ul> | The following mitigation measures will be implemented to reduce collision risk:<br><br><ul style="list-style-type: none"> <li>Bright white or bluish lights (mercury vapor, white incandescent and white fluorescent) are the most attractive to insects. Yellowish, pinkish, or orange (sodium vapor, halogen, dichroic yellow) are the least attractive to most insects. LED bulbs are less attractive because they produce low heat and long wavelengths of light as well as little or no ultraviolet radiation.</li> <li>Post-construction biodiversity management program will include a Post Construction Fatality Monitoring Plan (PCFM) which will entail detailed and intensive carcass searches will take place throughout the wind farm.</li> </ul> | The following mitigation measures will be implemented to reduce collision risk:<br><br><ul style="list-style-type: none"> <li>Bright white or bluish lights (mercury vapor, white incandescent and white fluorescent) and high sodium vapour light are the most attractive to insects and will not be used</li> <li>Post-construction Biodiversity Management Program will include a Post Construction Fatality Monitoring Plan (PCFM) which will entail detailed and intensive carcass searches will take place throughout the wind farm.</li> </ul>   | <b>This section has been updated to reflect the requirement for the project to implement the PCFMP. The PCFMP has been prepared and includes the mitigation/management measure and monitoring requirements for the project during the operational phase.</b>  |

| SECTION                     | HEADING   | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)   | JUSTIFICATION FOR MATERIAL CHANGE  |
|-----------------------------|---|---|--|--|--|
|                             |   |   | <p>searches will take place throughout the wind farm</p> <ul style="list-style-type: none"> <li>• Thresholds will be established for acceptable levels of annual losses, which will be determined on a species-specific basis via the principles of Potential Biological Removal. Should the Fatality Monitoring prove that thresholds for any particular species are reached, this will trigger an upscaling of mitigation. These thresholds will be developed in the Collision Risk Management Plan.</li> <li>• The Collision Risk Management Plan will include all operational measures that can be implemented to reduce collision risk. This plan will include a detailed Cut-in Curtailment Program, wherein turbines are shutdown and prevented from moving, during periods of high bat activity</li> </ul> |  |  |
| 7.4                         | <b>Implementation Mitigation: Planning, Management and Monitoring</b>                                     | <p>Not Applicable.</p> <p>See next cell for new text added to this section</p>  | <p>Not Applicable.</p> <p>See next cell for new text added to this section</p>   | <p>A Biodiversity Management Plan has been prepared which details the management plan to be implemented during each phase of the project, monitoring and reporting requirements i.e., the Biodiversity Monitoring and Evaluation Plan (BMEP) as well the entity responsible for the implementation of each plan.</p> | <p><b>The BMP has been prepared for the project and will be required to be implemented at different stages of the project i.e., pre-construction, construction, post-construction and operational phase.</b></p>                         |
| 8.3.1.1                     | <b>Dust Generation: Dust emission and Particulate Dispersion from Storage of Batching Plant Materials</b> | <p>At this stage the exact location of the batching plant is unknown however it is expected that it will be located more than 500m from the worker accommodation camp which is also located on site and at a distance of more than 500m from local communities.</p> | <p>At this stage the exact location of the batching plant is unknown however it is expected that it will be located more than 500m from the worker accommodation camp which is also located on site and at a distance of more than 500m from local communities.</p>  | <p>The batching plant is located approximately 2.3km of the worker accommodation camp which is also located on site and at a distance of more than 500m from local communities.</p>  | <p><b>Given that the location of the batching plant is now known, this section of the ESIA has been updated to reflect the location of the batching plant and more targeted mitigations proposed (refer to section 2.4.3 above).</b></p> |
| Section 8.3.1:<br>Table 8-4 | <b>Mitigation and Management Measures</b>   | <p>Not Applicable.</p> <p>See next cell for new text added to this section</p>  | <p>Not Applicable.</p> <p>See next cell for new text added to this section</p>   | <p>Where applicable, the EPC Contractor will obtain all necessary permits required for the operation of HGV and diesel</p>   | <p><b>As requested by lenders, this mitigation measure have been added to the latest version of the ESIA.</b></p>  |

| SECTION                    | HEADING  | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)   | JUSTIFICATION FOR MATERIAL CHANGE   |
|----------------------------|--|---|---|--|---|
|                            |  |   |   | generators within emission standards.  |   |
| Section 8.4: Table 8-6     | Frequency & Durations  | General visual observation for dust emissions to be undertaken on a daily basis. To be monitored quantitatively if generation is considered to be excessive or complaints/grievances are received.  | General visual observation for dust emissions to be undertaken on a daily basis. To be monitored quantitatively if generation is considered to be excessive or complaints/grievances are received.  | General visual observation for dust emissions to be undertaken on a daily basis and if dust is visible and/or complaints/grievances are received, dust meter should be used to quantitatively monitor dust.  | <b>There is now a requirement to quantitatively monitor dust generated if it is visible or grievances are received.</b>   |
| Section 9.3.1.1: Table 9-9 | Batching Plant Works   | Not Applicable.<br>See next cell for new text added to this section   | Not Applicable.<br>See next cell for new text added to this section   | The anticipated construction equipment/machinery to be used at the site for batching plant works together with noise data for this equipment have now been presented in the table.   | <b>This section has been updated to include the equipment/machinery to be used at the site for batching plant works.</b>  |
| Section 9.3.1.1            | Batching Plant Works   | Not Applicable.<br>See next cell for new text added to this section   | Not Applicable.<br>See next cell for new text added to this section   | The batching plant work noise assessment have now been included in this section  | <b>Given that the location of the batching plant is now known, the ESIA has now assess the potential noise impact from the batching plant and provided the appropriate mitigations that will require to be implemented.</b>   |
| 9.3.1.5                    | Noise Impacts at Accommodation Facilities Located on Site                              | Currently, the exact location of the accommodation facilities has not been determined at this point. As such, the EPC Contractor will be required to undertake further consideration of noise impacts and implement any required mitigations once the location of accommodation facilities is confirmed by suing a similar method to that outlined above. | Currently, the exact location of the accommodation facilities has not been determined at this point. As such, the EPC Contractor will be required to undertake further consideration of noise impacts and implement any required mitigations once the location of accommodation facilities is confirmed by suing a similar method to that outlined above. | Given that the worker accommodation is located approximately 500m from the proposed laydown and 2.3km from the batching plant, the anticipated noise levels that will be perceived at the worker accommodation as a result of site preparatory works, building & foundation works, mechanical & installation works and batching plant activities have been provided within the updated ESIA. | <b>A summary of noise assessment at worker accommodation for the different construction activities at the site has been provided in the ESIA and appropriate mitigation and monitoring measures provided. The residual noise impact on workers accommodation is expected to be minor after the implementation of the mitigations.</b> |
| Section 9.3.1: Table 9-20  | Impacts at the accommodation areas located at the Project site                         | <b>Magnitude of Impact:</b> To Be Determined<br><b>Sensitivity:</b> To Be Determined<br><b>Potential Impact Significance:</b> To Be Determined<br><b>Residual Impact:</b> To Be Determined  | <b>Magnitude of Impact:</b> To Be Determined<br><b>Sensitivity:</b> To Be Determined<br><b>Potential Impact Significance:</b> To Be Determined<br><b>Residual Impact:</b> To Be Determined  | <b>Magnitude of Impact:</b> Minor Negative<br><b>Sensitivity:</b> High<br><b>Potential Impact Significance:</b> Minor to Moderate<br><b>Residual Impact:</b> Minor   | As in section 9.3.1.5 above.  |
| 11.1.2.2                   | Transportation Route from Yallama (Kazakhstan - Uzbekistan Border) to the Project Site | Additional road surveys are expected to be undertaken before the commencement of delivery of Project equipment, machinery and materials.  | Additional road surveys are expected to be undertaken before the commencement of delivery of Project equipment, machinery and materials.  | The Route Survey report prepared in August 2021 and the Planned Civil Works for Transportation of WTG Equipment from China to Uzbekistan, Kazakhstan &   | <b>The section has been updated to include the Route Survey report from the EPC which was not available during the preparation of the ESIA's in March/May/July 2022. The outcome of the Route</b>   |

| SECTION  | HEADING  | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)   | JUSTIFICATION FOR MATERIAL CHANGE   |
|----------|--|--|---|--|---|
|          |  |  |   | Uzbekistan (Preliminary Report) is presented in Appendix.  | survey did not necessitate updates to the impacts/mitigations/monitoring.   |
|          | <b>Intangible Cultural Heritage</b>            | Not Applicable.<br>See next cell for new text added to this section  | <b>13.2. Intangible Cultural Heritage</b><br><br>As discussed in section 6.4 there are 4 elements of intangible cultural heritage occurring across Uzbekistan while the others are mainly region specific. In order to verify the elements within the communities near the Wind Farm, consultations were undertaken with a history teacher from Ayakagitma village on 12th May 2022 who confirmed that Palov culture, Nawrouz, Art of Miniature and Bakshi art are present in his community. These elements are practiced in community setting as well as within family groups. | <b>13.2.2: Tangible Cultural Heritage</b><br><br>During the public disclosure of the ESIA, community members from Ayakagitma village, Chulobod village and Kuklam village were asked about the tangible cultural heritage and some of the participants of the disclosure meeting stated that the main tangible cultural heritage item in the project area is Malikajdar (Xazonur bobo) burial place located 9km from Ayakagitma village. This is a holy place that is visited once or twice a year by locals for pilgrimage. This holy place is 22km from Chulobod village and 35km from Kuklam village. | <b>Based on consultation with community members, this section has been updated to include a summary of the intangible and tangible cultural heritage items in the WF area of influence.</b><br><br><b>Appropriate mitigation measures has been provided. The residual impact on intangible and tangible cultural heritage is expected to be minor after the implementation of mitigations.</b>              |
| 16.1.6   | <b>Use of Project Site: Local Access Roads</b> | Not Applicable.<br>See next cell for new text added to this section  | Not Applicable.<br>See next cell for new text added to this section   | During the public disclosure of the ESIA, community members of Kuklam village, Chulobod village and Ayakagitma village were informed that access through the project site maybe limited and, in some cases, restricted and the participants indicated that they have no concerns in relation to the existing access roads as there are other roads in the project area that can be used.   | <b>The update on the ESIA shows that consultations have been undertaken with local communities informing them of potential disruption to accessing access roads through the site. Even no concerns were raised by the communities, they will continue to have access to the grievance redress mechanism.</b>  |
| 16.3.1.4 | <b>Consumption of Water</b>                    | At this stage it is understood that water will be supplied to the Project site via water tanker trucks however, it has not been confirmed where the water will be sourced from | At this stage it is understood that water will be supplied to the Project site via water tanker trucks however, it has not been confirmed where the water will be sourced from  | At this stage it is understood that the EPC Contractor will potentially establish boreholes at the project site in order to abstract groundwater for concrete works and other water requirements at the batching plant. Given the scarcity of water in the Project area, a water supply assessment will be undertaken to assess the availability of water for the Project and if there will be significant impacts to local  | <b>The potential use of ground water for construction requires the Project Company to undertake a Water Availability Assessment (to be submitted to lenders) before the start of construction and to obtain the relevant permits if groundwater abstraction is considered viable.</b><br><br><b>The EPC Contractor will implement the water availability assessment and develop a Water Management Plan</b> |

| SECTION  | HEADING                   | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE   |
|----------|---------------------------|--|--|---|---|
|          |                           |  |  | <p>community users. This assessment will also include cumulative impacts of other proposed development projects that may also depend on similar water sources and the potential impacts of climate change. In addition, the EPC Contractor will be required to obtain water abstraction permits from the relevant authorities before drilling of any wells can commence.</p> <p>Potable water will be supplied to the Project site via water tanker trucks to cover the potable water demand of the project however, it has not been confirmed where the water will be sourced from.</p>  |   |
| 16.3.1.9 | <b>Supply Chain Risks</b> | <p>Supply Chain Risks were not assessed in this version as no information was available at this point.</p> | <p>SGS has mapped 22 suppliers for the Project which include Envision (Tier 1) and the rest as Tier 2 &amp; 3. The scope of the on-going assessment includes the following:</p> <ul style="list-style-type: none"> <li>• Desktop screening of labour, HSE risks through review of the suppliers' policies/procedures and public concerns/court case results etc.</li> <li>- Online screening of labour, HSE risk through the review of the suppliers' policies and procedures and public concerns/court cases results and employee feedback has been undertaken and completed for 14 out of the 22 suppliers.</li> <li>- The screening of the 14 suppliers has concluded that there is no presence of child and/or forced labour.</li> <li>• Site based assessments will be undertaken for all suppliers where there are issues identified during the desktop screening prior to the submission/approval of the project by the lending banks.</li> </ul> | <p>A supply chain mapping and due diligence study was conducted by an international consultancy, SGS, to assess the supply chain risks in Envision and its suppliers (21 suppliers including suppliers of key materials such as steel rod &amp; plate, cast iron, fiberglass/composite materials, aluminium and copper).</p> <p>Supply Chain Due Diligence (SC DD) study conducted by SGS included:</p> <ul style="list-style-type: none"> <li>• Initial-screening: a review of all relevant documentation available in the public domain on Envision and Envision's core suppliers including but not limited to union complaints, recent legal cases/appeals, public allegations including NGO claims, etc.</li> <li>• Online assessment: desktop review and assessment of HR policies, management plans, procedures, internal reports and employee data of the Envision and its 16 core suppliers with a specific focus on labour issues including forced and child labour, overtime work, freedom of association, harassment, disciplinary measures and</li> </ul> | <p>SC DD concluded that there is no evidence of "zero tolerance" issues such as forced and child labour in WTG (Envision) and its suppliers. Envision implements a Supplier Code of Conduct that is a total-chain initiative, as such applicable to all suppliers and their subsidiaries, affiliated parties, sub-contractors, and third-party intermediaries. The Supplier Code of Conduct has comprehensive provisions covering strict zero-tolerance policies for forced labour and child labour, as well as wage standards, health and safety standards, among other provisions in line with the UNGPs, the Universal Declaration on Human Rights and ILO Core Standards, in addition to requiring adherence to local/national laws. The Envision also publishes a statement on Modern Slavery &amp; Human Trafficking; this entails commitments to ensure that there is no modern slavery or human trafficking in their supply chains or business activities. Review of these documents proved that Envision's policies are generally in line with the</p> |

| SECTION | HEADING | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION) | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)   | JUSTIFICATION FOR MATERIAL CHANGE |
|---------|---------|---|---|--|-----------------------------------|
|         |         |   | <p>employee grievance mechanism etc.</p> <ul style="list-style-type: none"> <li>• Onsite assessment of the five sub-suppliers which couldn't be assessed through online assessment due to limited information made available during online assessment.</li> <li>• Interviews with management and online questionnaires conducted to workers (in total 348 workers) who were randomly selected from Envision and its 20 suppliers during online and onsite assessments.</li> </ul> | <p>Bank requirements for supply chains</p> <p>Although, the SC DD identified no evidence of forced and child labour issues in Envision and its supply chain, a number of non-compliance points were identified, these largely relate to inconsistencies in policies against the requirements and implementation practices, overtime issues, gaps in HSE processes, disciplinary and grievance mechanism or employee record-keeping systems.</p> <p>A corrective action plan (CAP) will be developed to address each gap identified during SC DD and Envision agreed to follow up and report on the closure of these gaps in accordance with the timeline agreed with the Company in the ESAP. A Supply Chain Management Plan (SCMP) was prepared and will be implemented by the Company, explaining ACWA Power's own labour and supplier policies and management systems, resources to address labour risks in EPC and in their suppliers.</p> <p>Other mitigations adopted for the project:</p> <ul style="list-style-type: none"> <li>(a) ESAP actions requiring the Company to establish a responsible sourcing policy and ensure traceability from EPC and wind turbine suppliers;</li> <li>(b) Having EPC, Envision and its core suppliers adopt self-declarations and codes of conduct regarding prohibition of any forms of forced labour in their operations;</li> <li>(c) Legal covenants to be added to the EPC contract mandating EPC to map and then complete risk assessment</li> </ul> |                                   |

| SECTION  | HEADING   | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE   |
|----------|---|---|---|---|---|
|          |   |   |   |   | <p>of core suppliers including wind turbines;</p> <p>(d) Company to obtain a Letter of Commitment from Envision that the list of suppliers are to be involved in production/assembly of turbines will be locked contractually and any new or replacement suppliers should go through a separate due diligence process to confirm no association with forced labour risks.</p> <p>(e) To address non-compliances that were identified through SC DD or will be identified in future audits through a Corrective Action Plan in a timely manner</p> <p>(f) Commitment for the Company to provide notifications to EBRD if/when forced labour risks or allegations are raised in relation to the Envision and its core suppliers; and</p> <p>(g) Dis- engagement clauses added to the contracts in case of material non-compliance with key provisions listed above.</p> |
| 17       | <b>Stakeholder Engagement and Consultation</b>  | <p>The chapter describes the public consultation and engagement process undertaken during the preparation of the ESIA.</p> <p>The minutes of meetings of the public consultation was also provided in this chapter</p>  | <p>Not Applicable.</p> <p>This section has been moved to the project specific SEP.</p>  | <p>Not Applicable.</p> <p>This section has been moved to the project specific SEP.</p>  | <p><b>The Stakeholder Engagement and Consultation Chapter has been moved from the ESIA because it was deemed more appropriate to include the public consultation, engagement process as well as outcomes in the standalone Stakeholder Engagement Plan (SEP) for the Project.</b></p> <p><b>It is noted that outcome of consultations with different stakeholders i.e., on archaeology, intangible cultural heritage, Infrastructure &amp; utilities, health protection zones etc are provided within the applicable chapters of the ESIA.</b></p>  |
| 18.3.1.2 | <b>Biodiversity Loss - Direct Mortality and Lowered Survivorship: General Disturbance</b> | <p>The following mitigation measures will be implemented to minimize the magnitude of these potential impacts:</p> <ul style="list-style-type: none"> <li>• Minimize construction footprint buffer zones and temporary laydown areas.</li> <li>• Minimize duration of construction period avoiding most sensitive months/ seasons (e.g. bird breeding season) where possible.</li> <li>- Houbara Bustard breeding season begin in mid-March and lasts until the end of July.</li> </ul> | <p><b>17.3.1.2: Biodiversity Loss - Direct Mortality and Lowered Survivorship: General Disturbance</b></p> <p>The following mitigation measures will be</p> | <p><b>17.3.1.2: Biodiversity Loss - Direct Mortality and Lowered Survivorship: General Disturbance</b></p> <p>The following mitigation measures will be implemented</p> | <p>Some details have been removed in order to simplify the text. All the buffer zones, seasonality requirements and justifications/rationale for the same are now provided within the BBPP instead of the ESIA.</p>   |

| SECTION | HEADING | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE |
|---------|---------|---|---|---|-----------------------------------|
|         |         | <p>- Egyptian Vulture's breeding season occurs during summer months (June, July &amp; August).</p> <ul style="list-style-type: none"> <li>• The pre-construction biodiversity management program will include a Breeding Birds Protection Plan, which will provide the detailed timings, scope and methodology for pre-construction nest searching in the appropriate seasons and locations; nests for these target species will be protected in-situ and no construction works will be allowed throughout the duration of the breeding season within 500m of the nests.</li> <li>• Restore temporary laydown areas and buffer zones post construction with native vegetation and re-seeding with native flora. The detailed methodology for timing, scope and methods will be prepared in the Restoration Action Plan</li> </ul> | <p>implemented to minimize the magnitude of these potential impacts:</p> <ul style="list-style-type: none"> <li>• Minimize construction footprint buffer zones and temporary laydown areas.</li> <li>• Minimize duration of construction period avoiding most sensitive months/ seasons (e.g. bird breeding season) where possible.</li> </ul> <p>- Houbara Bustard breeding season begin in mid-March and lasts until the end of July.</p> <p>- Egyptian Vulture's breeding season occurs during summer months (June, July &amp; August).</p> <ul style="list-style-type: none"> <li>• The pre-construction biodiversity management program will include a Breeding Birds Protection Plan, which will provide the detailed timings, scope and methodology for pre-construction nest searching in the appropriate seasons and locations; nests for these target species will be protected in-situ and no construction works will be allowed throughout the duration of the breeding season within 500m of the nests.</li> <li>• Restore temporary laydown areas and buffer zones post construction with native vegetation and re-seeding with native flora. The detailed methodology for timing, scope and methods will be prepared in the Restoration Action Plan</li> </ul> | <p>to minimize the magnitude of these potential impacts:</p> <ul style="list-style-type: none"> <li>• Minimize construction footprint buffer zones and temporary laydown areas.</li> <li>• A Breeding Bird Protection Plan has been prepared which provides the protection measures and protocols i.e., micrositing of turbines within close proximity to raptor nests and buffers to be implemented at known nest locations based on species sensitivity. The plan also outlines the monitoring and reporting requirements of the construction phase as well as the assigned roles and responsibilities of the involved entities</li> <li>• The Restoration Action Plan provides the restoration measures that will be undertaken for natural habitats, post-construction restoration of temporary laydown areas and buffer zones via seeding, re-planting, and landscaping with native, high-value species, monitoring and reporting requirements of the plan as well assigned roles and responsibilities.</li> </ul> |                                   |

| SECTION  | HEADING                             | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE  |
|----------|-------------------------------------|--|---|---|--|
| 18.3.1.5 | <b>Environmental Quality: Noise</b> | <p>The following mitigation measures will be implemented to minimize the magnitude of these potential impacts:</p> <ul style="list-style-type: none"> <li>• Refer to noise control measures.</li> <li>• Minimise noise during sensitive months/seasons (eg bird breeding season) where possible:</li> <li>- Houbara Bustard breeding seasons begins in mid-March and lasts until the end of July.</li> <li>- Egyptian Vulture's breeding season occurs during summer months (June, July and August).</li> <li>• The pre-construction biodiversity management program will include a Breeding Birds Protection Plan, which will provide the detailed timings, scope and methodology for pre-construction nest-searching in the appropriate seasons and locations; nests for target species will be protected in-situ and no construction works will be allowed throughout the duration of the breeding season within 500m of the nests. Noise barriers, if deemed feasible, will be erected if required to ensure breeding birds are not impacted by excessive noise.</li> <li>• Install temporary acoustic barriers around large generators, dampening, best available technology to reduce noise as much as practicable. Intermittent noise is less desirable than continuous noise as it does not allow for habituation</li> </ul> | <p><b>17.3.1.5: Environmental Quality: Noise</b></p> <p>The following mitigation measures will be implemented to minimize the magnitude of these potential impacts:</p> <ul style="list-style-type: none"> <li>• Refer to noise control measures.</li> <li>• Minimise noise during sensitive months/seasons (e.g. bird breeding season) where possible:</li> <li>- Houbara Bustard breeding seasons begins in mid-March and lasts until the end of July.</li> <li>- Egyptian Vulture's breeding season occurs during summer months (June, July and August).</li> <li>• The pre-construction biodiversity management program will include a Breeding Birds Protection Plan, which will provide the detailed timings, scope and methodology for pre-construction nest-searching in the appropriate seasons and locations; nests for target species will be protected in-situ and no construction works will be allowed throughout the duration of the breeding season within 500m of the nests. Noise barriers, if deemed feasible, will be erected if required to ensure breeding birds are not impacted by excessive noise.</li> <li>• Install temporary acoustic barriers around large generators, dampening, best available technology to reduce noise as much as practicable. Intermittent noise is less desirable than continuous noise as it does not allow for habituation</li> </ul> | <p><b>17.3.1.5: Environmental Quality: Noise</b></p> <p>The following mitigation measures will be implemented to minimize the magnitude of these potential impacts:</p> <ul style="list-style-type: none"> <li>• Refer to noise control measures.</li> <li>• A Breeding Bird Protection Plan has been prepared which provides the protection measures and protocols such as buffers to be implemented at known nest locations based on species sensitivity. The plan also outlines the monitoring and reporting requirements of the construction phase as well as the assigned roles and responsibilities of the involved entities</li> <li>• Install temporary acoustic barriers around large generators, dampening, use of best available technology to reduce noise as much as possible. Intermittent noise is less desirable than continuous noise as it does not allow for habituation.</li> </ul> | <p><b>Some details have been removed in order to simplify the text. All the buffer zones, seasonality requirements and justifications/rationale for the same are now provided within the BBPP (which is in place) instead of the ESIA.</b></p> |

| SECTION  | HEADING  | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)   | JUSTIFICATION FOR MATERIAL CHANGE  |
|----------|--|--|--|--|--|
| 18.3.2.2 | <b>Biodiversity Loss - Direct Mortality and Lowered Survivorship: OHTL Collision</b> | <p>The following mitigation measures will be applied to reduce collision risks:</p> <ul style="list-style-type: none"> <li>• The Fatality Monitoring Plan will include Potential Biological Removal thresholds for species of concern, including Houbara Bustard. As this species has been determined to be critical as per the CHA, should the PBR threshold be exceeded, compensation will be provided in the form of funding for the Emirates Center for the Conservation of Houbara located in the region. The exact amount of funding to be provided will depend on the PBR and estimated actual losses, and estimations for these are currently under development.</li> <li>• Since Houbara Bustard are an extremely shy and cryptic species which may avoid the boundary of the wind farm. The wind farm infrastructure may cause an exaggerated habitat loss and displacement for this species in particular. A Compensation and Offset Plan is currently in development which will provide the detailed calculations of habitat loss and include the proposed location of habitat offset land which will be protected and/or restored from degraded land to provide suitable alternative habitat for the Houbara Bustard in line with the No-Net Loss and Net-positive Gain requirements for this Critical Species</li> </ul> | <p><b>18.3.2.2: Biodiversity Loss - Direct Mortality and Lowered Survivorship: OHTL Collision</b></p> <p>The following mitigation measures will be applied to reduce collision risks:</p> <ul style="list-style-type: none"> <li>• The Fatality Monitoring Plan will include Potential Biological Removal thresholds for species of concern, including Houbara Bustard. As this species has been determined to be critical as per the CHA, should the PBR threshold be exceeded, compensation will be provided in the form of funding for the Emirates Center for the Conservation of Houbara located in the region. The exact amount of funding to be provided will depend on the PBR and estimated actual losses, and estimations for these are currently under development.</li> <li>• Since Houbara Bustard are an extremely shy and cryptic species which may avoid the boundary of the wind farm. The wind farm infrastructure may cause an exaggerated habitat loss and displacement for this species in particular. A Compensation and Offset Plan is currently in development which will provide the detailed calculations of habitat loss and include the proposed location of habitat offset land which will be protected and/or restored from degraded land to provide suitable alternative habitat for the Houbara Bustard in line with the No-Net Loss and Net-positive Gain requirements for this Critical Species</li> </ul> | <p><b>18.3.2.2: Biodiversity Loss - Direct Mortality and Lowered Survivorship: OHTL Collision</b></p> <p>The following mitigation measures will be applied to reduce collision risks:</p> <ul style="list-style-type: none"> <li>• The Biodiversity Action Plan (BAP) provides the strategy for No Net Loss (NNL) for PBF species and Net Gain (NG) for the CH species, Asian Houbara.</li> <li>• The Compensation Offset Plan details the offset measures that will be implemented for the Asian Houbara if the PCFM exceeds the PBR thresholds.</li> </ul> | <p><b>Reference has been made to the appropriate management plans that have been prepared for the project including the PBR, BAP, Compensation Offset Plan and PCFM. These plans are in place and will be implemented by the Project in order to meet lender requirements.</b></p> |

| SECTION  | HEADING   | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE  |
|----------|---|---|---|---|--|
| 18.3.2.2 | <b>Biodiversity Loss - Direct Mortality and Lowered Survivorship: OHTL Electrocution</b>  | <p>Therefore, for above-ground designs, the following integrated measures will be applied</p> <ul style="list-style-type: none"> <li>• A Post-Construction Fatality Monitoring Plan will be in place to include carcass searches and mortality rate calculations for the OHTL. The Fatality Monitoring Plan will include Potential Biological Removal thresholds for species of concern. The Post-construction Fatality Monitoring Program will be continued for up to 5 years until the risk to birds is considered 'negligible' in consultation with the lenders;</li> <li>• Reconfiguration and retrofitting of existing dangerous OHTL in the region would be a particularly effective compensatory offset with potential net gain benefits for affected species</li> </ul> | <p><b>17.3.2.2: Biodiversity Loss - Direct Mortality and Lowered Survivorship: OHTL Electrocution</b></p> <p>Therefore, for above-ground designs, the following integrated measures will be applied</p> <ul style="list-style-type: none"> <li>• A Post-Construction Fatality Monitoring Plan will be in place to include carcass searches and mortality rate calculations for the OHTL. The Fatality Monitoring Plan will include Potential Biological Removal thresholds for species of concern. The Post-construction Fatality Monitoring Program will be continued for up to 5 years until the risk to birds is considered 'negligible' in consultation with the lenders;</li> <li>• Reconfiguration and retrofitting of existing dangerous OHTL in the region would be a particularly effective compensatory offset with potential net gain benefits for affected species</li> </ul> | <p><b>17.3.2.2: Biodiversity Loss - Direct Mortality and Lowered Survivorship: OHTL Electrocution</b></p> <p>Therefore, for above-ground designs, the following integrated measures will be applied:</p> <ul style="list-style-type: none"> <li>• A PCFM will be in place to include carcass searches for the OHTL. The Fatality Monitoring Plan will include Potential Biological Removal thresholds for species of concern. The Post-construction Fatality Monitoring Program will be continued for up to 5 years until the risk to birds is considered 'negligible' in consultation with the lenders;</li> <li>• The Compensation Offset Plan details the offset measures that will be implemented for the Asian Houbara if the PCFM exceeds the PBR thresholds</li> </ul> | <p><b>The PCFM &amp; Compensation Offset Plan have been prepared and are in place and they include additional requirements for the project including the monitoring requirements.</b></p>                                |
| 18.4     | <b>Implementation Mitigation: Planning, Management and Monitoring</b>                     | <p>Not Applicable.</p> <p>See next cell for new text added to this section</p>  | <p>Not Applicable.</p> <p>See next cell for new text added to this section</p>  | <p><b>17.4: Implementation Mitigation: Planning, Management and Monitoring</b></p> <p>A Biodiversity Management Plan has been prepared which details the management plan to be implemented during each phase of the project, monitoring and reporting requirements i.e., the Biodiversity Monitoring and Evaluation Plan (BMEP) as well the entity responsible for the implementation of each plan</p>  | <p><b>This section has been updated to reflect the management plans that have been prepared and will be implemented.</b></p> <p><b>These plans include the mitigation measures &amp; monitoring for the project.</b></p> |
| 18.3.1.2 | <b>Biodiversity Loss - Direct Mortality and Lowered Survivorship: General Disturbance</b> | <p>The following mitigation measures will be implemented to minimize the magnitude of these potential impacts:</p> <ul style="list-style-type: none"> <li>• Minimize construction footprint buffer zones and temporary laydown areas.</li> <li>• Minimize duration of construction period avoiding most sensitive</li> </ul>  | <p><b>17.3.1.2: Biodiversity Loss - Direct Mortality and Lowered Survivorship: General Disturbance</b></p>  | <p><b>17.3.1.2: Biodiversity Loss - Direct Mortality and Lowered Survivorship: General Disturbance</b></p>  | <p><b>Some details have been removed in order to simplify the text. All the buffer zones, seasonality requirements and justifications/rationale for the</b></p>  |

| SECTION  | HEADING                             | ORIGINAL TEXT (MARCH2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)   | JUSTIFICATION FOR MATERIAL CHANGE  |
|----------|-------------------------------------|---|--|--|--|
|          |                                     | <p>months/ seasons (e.g. bird breeding season) where possible.</p> <ul style="list-style-type: none"> <li>- Houbara Bustard breeding season begin in mid-March and lasts until the end of July.</li> <li>- Egyptian Vulture's breeding season occurs during summer months (June, July &amp; August).</li> <li>• The pre-construction biodiversity management program will include a Breeding Birds Protection Plan, which will provide the detailed timings, scope and methodology for pre-construction nest searching in the appropriate seasons and locations; nests for these target species will be protected in-situ and no construction works will be allowed throughout the duration of the breeding season within 500m of the nests.</li> <li>• Restore temporary laydown areas and buffer zones post construction with native vegetation and re-seeding with native flora. The detailed methodology for timing, scope and methods will be prepared in the Restoration Action Plan</li> </ul> | <p>The following mitigation measures will be implemented to minimize the magnitude of these potential impacts:</p> <ul style="list-style-type: none"> <li>• Minimize construction footprint buffer zones and temporary laydown areas.</li> <li>• Minimize duration of construction period avoiding most sensitive months/ seasons (e.g. bird breeding season) where possible.</li> <li>- Houbara Bustard breeding season begin in mid-March and lasts until the end of July.</li> <li>- Egyptian Vulture's breeding season occurs during summer months (June, July &amp; August).</li> <li>• The pre-construction biodiversity management program will include a Breeding Birds Protection Plan, which will provide the detailed timings, scope and methodology for pre-construction nest searching in the appropriate seasons and locations; nests for these target species will be protected in-situ and no construction works will be allowed throughout the duration of the breeding season within 500m of the nests.</li> <li>• Restore temporary laydown areas and buffer zones post construction with native vegetation and re-seeding with native flora. The detailed methodology for timing, scope and methods will be prepared in the Restoration Action Plan</li> </ul> | <p>The following mitigation measures will be implemented to minimize the magnitude of these potential impacts:</p> <ul style="list-style-type: none"> <li>• Minimize construction footprint buffer zones and temporary laydown areas.</li> <li>• A Breeding Bird Protection Plan (BBPP) has been prepared which provides the protection measures and protocols i.e., micrositing of turbines within close proximity to raptor nests and buffers to be implemented at known nest locations based on species sensitivity. The plan also outlines the monitoring and reporting requirements of the construction phase as well as the assigned roles and responsibilities of the involved entities</li> <li>• The Restoration Action Plan provides the restoration measures that will be undertaken for natural habitats, post-construction restoration of temporary laydown areas and buffer zones via seeding, re-planting, and landscaping with native, high-value species, monitoring and reporting requirements of the plan as well assigned roles and responsibilities.</li> </ul> | <p>same are now provided within the BBPP(which is in place) instead of the ESIA.</p>   |
| 18.3.1.5 | <b>Environmental Quality: Noise</b> | <p>The following mitigation measures will be implemented to minimize the magnitude of these potential impacts:</p> <ul style="list-style-type: none"> <li>• Refer to noise control measures.</li> <li>• Minimise noise during sensitive months/seasons (eg bird breeding season) where possible:</li> <li>- Houbara Bustard breeding seasons begins in mid-March and lasts</li> </ul>   | <b>17.3.1.5: Environmental Quality: Noise</b>  | <b>17.3.1.5: Environmental Quality: Noise</b>  | <p>Some details have been removed in order to simplify the text. All the buffer zones, seasonality requirements and justifications/rationale for the</p> |

| SECTION  | HEADING  | ORIGINAL TEXT (MARCH2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE  |
|----------|--|---|--|---|--|
|          |  | <p>until the end of July. - Egyptian Vulture's breeding season occurs during summer months (June, July and August).</p> <ul style="list-style-type: none"> <li>• The pre-construction biodiversity management program will include a Breeding Birds Protection Plan, which will provide the detailed timings, scope and methodology for pre-construction nest-searching in the appropriate seasons and locations; nests for target species will be protected in-situ and no construction works will be allowed throughout the duration of the breeding season within 500m of the nests. Noise barriers, if deemed feasible, will be erected if required to ensure breeding birds are not impacted by excessive noise.</li> <li>• Install temporary acoustic barriers around large generators, dampening, best available technology to reduce noise as much as practicable. Intermittent noise is less desirable than continuous noise as it does not allow for habituation</li> </ul> | <p>the magnitude of these potential impacts:</p> <ul style="list-style-type: none"> <li>• Refer to noise control measures.</li> <li>• Minimise noise during sensitive months/seasons (e.g. bird breeding season) where possible:</li> <li>- Houbara Bustard breeding seasons begins in mid-March and lasts until the end of July.</li> <li>- Egyptian Vulture's breeding season occurs during summer months (June, July and August).</li> <li>• The pre-construction biodiversity management program will include a Breeding Birds Protection Plan, which will provide the detailed timings, scope and methodology for pre-construction nest-searching in the appropriate seasons and locations; nests for target species will be protected in-situ and no construction works will be allowed throughout the duration of the breeding season within 500m of the nests. Noise barriers, if deemed feasible, will be erected if required to ensure breeding birds are not impacted by excessive noise.</li> <li>• Install temporary acoustic barriers around large generators, dampening, best available technology to reduce noise as much as practicable. Intermittent noise is less desirable than continuous noise as it does not allow for habituation</li> </ul> | <p>these potential impacts:</p> <ul style="list-style-type: none"> <li>• Refer to noise control measures.</li> <li>• A Breeding Bird Protection Plan has been prepared which provides the protection measures and protocols such as buffers to be implemented at known nest locations based on species sensitivity. The plan also outlines the monitoring and reporting requirements of the construction phase as well as the assigned roles and responsibilities of the involved entities</li> <li>• Install temporary acoustic barriers around large generators, dampening, use of best available technology to reduce noise as much as possible. Intermittent noise is less desirable than continuous noise as it does not allow for habituation.</li> </ul> | <p><b>same are now provided within the BBPP instead of the ESIA.</b></p>   |
| 18.3.2.2 | <b>Biodiversity Loss - Direct Mortality and Lowered Survivorship: OHTL Collision</b> | <p>The following mitigation measures will be applied to reduce collision risks:</p> <ul style="list-style-type: none"> <li>• The Fatality Monitoring Plan will include Potential Biological Removal thresholds for species of concern, including Houbara Bustard. As this species has been determined to be critical as per the CHA, should the PBR threshold be exceeded, compensation will be provided in the form of funding for the Emirates Center for the Conservation of Houbara located in the region. The exact amount of funding to be</li> </ul>   | <p><b>18.3.2.2: Biodiversity Loss - Direct Mortality and Lowered Survivorship: OHTL Collision</b></p>  | <p><b>18.3.2.2: Biodiversity Loss - Direct Mortality and Lowered Survivorship: OHTL Collision</b></p> <p>The following mitigation measures will be applied to reduce collision risks:</p> <ul style="list-style-type: none"> <li>• The Fatality Monitoring</li> </ul>   | <p><b>Some details have been removed in favour of referencing the final management plans which have been prepared and will be implemented. These plans include the mitigation measures &amp; monitoring etc for the project.</b></p> |

| SECTION  | HEADING  | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)   | JUSTIFICATION FOR MATERIAL CHANGE |
|----------|--|--|--|--|-----------------------------------|
|          |  | <p>provided will depend on the PBR and estimated actual losses, and estimations for these are currently under development.</p> <ul style="list-style-type: none"> <li>Since Houbara Bustard are an extremely shy and cryptic species which may avoid the boundary of the wind farm. The wind farm infrastructure may cause an exaggerated habitat loss and displacement for this species in particular. A Compensation and Offset Plan is currently in development which will provide the detailed calculations of habitat loss and include the proposed location of habitat offset land which will be protected and/or restored from degraded land to provide suitable alternative habitat for the Houbara Bustard in line with the No-Net Loss and Net-positive Gain requirements for this Critical Species</li> </ul> | <p>Plan will include Potential Biological Removal thresholds for species of concern, including Houbara Bustard. As this species has been determined to be critical as per the CHA, should the PBR threshold be exceeded, compensation will be provided in the form of funding for the Emirates Center for the Conservation of Houbara located in the region. The exact amount of funding to be provided will depend on the PBR and estimated actual losses, and estimations for these are currently under development.</p> <ul style="list-style-type: none"> <li>Since Houbara Bustard are an extremely shy and cryptic species which may avoid the boundary of the wind farm. The wind farm infrastructure may cause an exaggerated habitat loss and displacement for this species in particular. A Compensation and Offset Plan is currently in development which will provide the detailed calculations of habitat loss and include the proposed location of habitat offset land which will be protected and/or restored from degraded land to provide suitable alternative habitat for the Houbara Bustard in line with the No-Net Loss and Net-positive Gain requirements for this Critical Species</li> </ul> | <p>(PBR) Analysis was undertaken to determine the thresholds for acceptable levels of annual losses due to the project.</p> <ul style="list-style-type: none"> <li>The Biodiversity Action Plan (BAP) provides the strategy for No Net Loss (NNL) for PBF species and Net Gain (NG) for the CH species, Asian Houbara.</li> <li>The Compensation Offset Plan details the offset measures that will be implemented for the Asian Houbara if the PCFM exceeds the PBR thresholds.</li> </ul> |                                   |
| 18.3.2.2 | <b>Biodiversity Loss - Direct Mortality and Lowered Survivorship: OHTL Electrocution</b> | <p>Therefore, for above-ground designs, the following integrated measures will be applied</p> <ul style="list-style-type: none"> <li>A Post-Construction Fatality Monitoring Plan will be in place to include carcass searches and mortality rate calculations for the OHTL. The Fatality Monitoring Plan will include Potential Biological Removal thresholds for species of concern. The Post-construction Fatality Monitoring Program will be continued for up to 5 years until the risk to birds is considered 'negligible' in consultation with the lenders;</li> <li>Reconfiguration and retrofitting of existing dangerous OHTL in the</li> </ul>   | <p><b>17.3.2.2: Biodiversity Loss - Direct Mortality and Lowered Survivorship: OHTL Electrocution</b></p> <p>Therefore, for above-ground designs, the following integrated measures will be applied:</p> <ul style="list-style-type: none"> <li>A PCFM will be in place to include carcass searches for the</li> </ul>   | <p><b>17.3.2.2: Biodiversity Loss - Direct Mortality and Lowered Survivorship: OHTL Electrocution</b></p> <p>Therefore, for above-ground designs, the following integrated measures will be applied:</p> <ul style="list-style-type: none"> <li>A PCFM will be in place to include carcass searches for the</li> </ul>   |                                   |

| SECTION | HEADING   | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|---|--|---|---|--|
|         |   | region would be a particularly effective compensatory offset with potential net gain benefits for affected species | <ul style="list-style-type: none"> <li>• A Post-Construction Fatality Monitoring Plan will be in place to include carcass searches and mortality rate calculations for the OHTL. The Fatality Monitoring Plan will include Potential Biological Removal thresholds for species of concern. The Post-construction Fatality Monitoring Program will be continued for up to 5 years until the risk to birds is considered 'negligible' in consultation with the lenders;</li> <li>• Reconfiguration and retrofitting of existing dangerous OHTL in the region would be a particularly effective compensatory offset with potential net gain benefits for affected species</li> </ul> | OHTL. The Fatality Monitoring Plan will include Potential Biological Removal thresholds for species of concern. The Post-construction Fatality Monitoring Program will be continued for up to 5 years until the risk to birds is considered 'negligible' in consultation with the lenders; • The Compensation Offset Plan details the offset measures that will be implemented for the Asian Houbara if the PCFM exceeds the PBR thresholds |  |
| 18.4    | <b>Implementation Mitigation: Planning, Management and Moni</b> | Not Applicable.<br>See next cell for new text added to this section  | Not Applicable.<br>See next cell for new text added to this section   | <b>17.4: Implementation Mitigation: Planning, Management and Monitoring</b><br><br>A Biodiversity Management Plan has been prepared which details the management plan to be implemented during each phase of the project, monitoring and reporting requirements i.e., the Biodiversity Monitoring and Evaluation Plan (BMEP) as well the entity responsible for the implementation of each plan   | <b>This section has been updated to reflect the management plan that have been prepared and will be implemented. These plans include the mitigation measures &amp; monitoring for the project.</b>   |
| 25.2    | <b>Intangible Cultural Heritage</b>                             | Not Applicable.<br>See next cell for new text added to this section  | <b>25.2 Intangible Cultural Heritage</b><br><br>Though specific consultations have not been undertaken along the OHTL in relation to existing elements of intangible cultural heritage, it is highly likely that at least two (Palov culture and Nawrouz) are practiced within communities along the OHTL as they are common across   | <b>25.2: Intangible and Tangible Cultural Heritage</b><br><br>During the public disclosure of the ESIA, representatives of Municipalities along the OHTL route were asked about the intangible and tangible cultural heritage and the responses   | <b>Based on consultation with Municipalities along the OHTL, this section has been updated to include a summary of the intangible and tangible cultural heritage items in the OHTL area of influence.</b><br><br><b>A table has been provided in the ESIA to outline the intangible and tangible cultural heritage items/practices along the OHTL route.</b> |

| SECTION | HEADING                                   | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)   | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|---|--|--|--|--|
|         |   |  | Uzbekistan. The nearest community to the OHTL is Kuklam village which is located approximately 2.1km south east of the Bash - Kurakul OHTL. However, it is noted that there are land users (herders, farmers and commercial) along the OHTL who may potentially also practice the same elements.   | provided are presented in the ESIA.  |  |
| 28.1    | <b>Observation and Baseline Condition</b> | Baseline condition of the socio-economic characteristics at the five (5) districts that the OHTL runs through have been summarized in the report   | Not Applicable.<br>This section has been moved to Chapter 6 (section 6.5) which provides baseline socio-economic information for the Wind Farm and OHTL.   | Not Applicable.<br>This section has been moved to Chapter 6 (section 6.5) which provides baseline socio-economic information for the Wind Farm and OHTL  | <b>This section has been moved because it was deemed appropriate to include the baseline socio-economic information of the various districts along the Bash -Karakul OHTL route in Chapter 6 where the regional baseline conditions for the Wind Farm and OHTL have been summarized.</b><br><b>Refer to section 6.5.2 for the key socio-economic characteristics along the OHTL route.</b> |
| 28.1.2  | <b>Socio-economic Survey</b>              | Existing published information has been used to establish the baseline socio-economic conditions along the OHTL. Socio-economic survey was undertaken with directly impacted persons along the OHTL alignment between 27th and 31st January 2022. The survey identified that there are farmers, herders and business owners along the OHTL route. Detailed outcome of the socio-economic surveys targeting project affected persons (PAPs) along the OHTL has been included in the Project specific RAP. | <b>Section 27.1.1</b><br><br>The socio-economic survey along the OHTL was conducted between 27th and 31st January 2022 using survey questionnaires targeting directly impacted land lease holders and users as part of the Project specific RAP process. Since the design of the OHTL has not been finalised, the Client advised that an assessment of impacts should be undertaken within a 50m of each side of the OHTL which also accounts for the 30m HPZ.<br><br>Based on this AOL (100m), socio-economic questionnaires were administered to land users who included herders, farmers, commercial enterprises and their workers. Institutional and government agencies land owners and lease holders including LLC clusters under SWID and State Forest Funds were not included in the socio-economic surveys.<br><br>A total of 16 land users were surveyed (formal and informal) | <b>Section 27.1.1</b><br><br>The socio-economic survey along the OHTL was conducted between 27th and 31st January 2022 using survey questionnaires targeting directly impacted land lease holders and users as part of the Project specific RAP process. Since the design of the OHTL has not been finalised, the Client advised that an assessment of impacts should be undertaken within a 50m of each side of the OHTL which also accounts for the 30m HPZ.<br><br>Based on this AOL (100m), socio-economic questionnaires were administered to land users who included herders, farmers, commercial enterprises and their workers. Institutional and government agencies land owners and lease holders including LLC clusters under SWID and State Forest Funds were not included in the socio-economic surveys.<br><br>A total of 16 land users were surveyed (formal and informal) | <b>Given that the Resettlement Action Plan chapter was moved from the ESIA, this section was updated to reflect a summary of the outcome of the socio-economic survey undertaken along the OHTL.</b><br><br><b>Detailed socio-economic survey outcome is presented in the project-specific RAP.</b>  |

| SECTION  | HEADING                                       | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)   | JUSTIFICATION FOR MATERIAL CHANGE  |
|----------|---|--|---|--|--|
|          |   |  | <p>SWID and State Forest Funds were not included in the socio-economic surveys. A total of 16 land users were surveyed (formal and informal land users) including 17 workers. Out of the 16 PAPs, 7 were farmers, 5 were herders and 4 own commercial land that has not been developed yet. The survey established the socio-economic profile of the land lease/users along the OHTL details of which are provided in the Project Specific RAP.</p> | <p>land users) including 17 workers. Out of the 16 PAPs, 7 were farmers, 5 were herders and 4 own commercial land that has not been developed yet. The survey established the socio-economic profile of the land lease/users along the OHTL details of which are provided in the Project Specific RAP.</p> |  |
| 31       | <b>Resettlement Action Plan</b>               | <p>This chapter identifies the Potentially Affected Persons (PAPs) that will be physically or economically displaced as a result of the development of the wind farm and/or the OHTL.</p>  | <p>Not Applicable. This section has been moved to the project specific RAP. Elements relating to land use, economic and physical displacement etc are embedded within the ESIA.</p>   | <p>Not Applicable. This section has been moved to the project specific RAP. Elements relating to land use, economic and physical displacement etc are embedded within the ESIA.</p>  | <p><b>The Resettlement Action Plan Chapter has been moved from the ESIA into the Project specific RAP. Elements relating to land use, economic and physical displacement, impacts assessments etc are embedded within the ESIA in sections: 2.2 Land Use and Site Condition, Chapters 16 &amp; 27 : Socio-economics, Chapter 29 Community Health, Safety &amp; Security etc.</b></p>   |
| 32.2.1.4 | <b>Human Right Risks to Local Communities</b> | <p>Based on the Project's area of influence (as per potential impacts upon different environmental and social parameters), there are expected to be specific Project impacts to communities relating to health, safety and security, land acquisition etc. It is noted that a Grievance Mechanism has been established within the standalone Stakeholder Engagement Plan (SEP) for the Project, which will allow any third-parties to raise grievances against the Project without cost, retribution or fear of negative consequences.</p> <p>In addition, the Project will ensure that the right of local communities to a clean and safe environment is safeguarded through the implementation of mitigation and management measures detailed in this ESIA including adherence to all monitoring requirements:</p> <ul style="list-style-type: none"> <li>• Risk to Security;</li> <li>• Local Community Right to Health;</li> </ul> <p>Economic Right (Economic and Physical Displacement of Herders)</p> | <p>Not Applicable. This section has been embedded within other social sections of the ESIA.</p>   | <p>Not Applicable. This section has been embedded within other social sections of the ESIA.</p>  | <p><b>This section has now been embedded into within other social sections of the ESIA i.e., the human right risks to local communities in relation to security, right to health and economic right in other sub-sections of the Community, Health, Safety and Security Chapter.</b></p> <ul style="list-style-type: none"> <li>• Local Community right to security have now been assessed in section 29.2.1.3 on Public/Community Security and the assessment is more project specific</li> <li>• Local Community Right to Health have now been in Chapter 31: Influx Impact Assessment; section 31.1.1.4 on Increased Risk of Communicable Diseases &amp;</li> </ul> |

| SECTION  | HEADING                 | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE   |
|----------|-------------------------|--|---|---|---|
|          |                         |  |   |   | <p>Burden on Local Health Services and the assessment is more project specific;</p> <ul style="list-style-type: none"> <li>• Economic right (Economic and physical displacement of herders) has now been assessed in section 29.2.1.3 Public/Community Security and the assessment is more project specific</li> </ul> <p>Based on the changes made to the impact assessment section, the mitigation and monitoring measures have been updated accordingly.</p> |
| 32.2.2.1 | Public/Community Safety | Not Applicable. Assessment of potential risk to children and young people was not undertaken in the ESIA version disclosed by ADB. | <p><b>Section 29.2.2.1: Public/Community Safety</b></p> <p>Children and young people are curious in nature and may potentially want to explore the WTGs on site and the substation. As the Wind Farm is the first in their communities, they might attempt to climb on the WTG towers or over the substation fence which present a real risk of injury and in the worst-case result to fatalities. As such, the Project Company and O&amp;M Company will conduct ongoing awareness campaigns in the local communities targeting children and their parents. This will help them understand the risks and dangers involved.</p> <p>Some members of the public may also potentially want to vandalise Project equipment and facilities which would also pose safety risks to them and others. Information on the consequences of vandalism will be provided to local communities by the CLO in order to ensure co-existence between the</p> | <p>The text within the August 2022 ESIA is similar to the text in the disclosed ESIA in May 2022.</p> | <p>Due to security and safety risk to children and young people, this section has been updated to assess the potential impacts and appropriate mitigations and monitoring requirements have also been provided.</p>   |

| SECTION  | HEADING  | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE   |
|----------|--|---|---|---|---|
|          |  |   | Project and the communities.  |   |   |
| 33.2.1.2 | <b>Health Risk Associated to COVID-19</b>                            | The current COVID-19 pandemic poses potential risks to the health and safety of the workers and the development of the Project. It is expected that there will be approximately 700 to 1,000 workers at the peak of the Project construction phase. These workers will be sourced locally but will also include migrant workers from other regions of Uzbekistan and from other countries such as China, Turkey, India and European countries and thus heightening the risk of infection (i.e. some workers may come from regions/countries with higher COVID-19 infection cases). Such a high number of workers working in close proximity or confined spaces increases the risk of infection. Risk of exposure will also be potentially high in shared accommodation areas, canteens and transportation buses. The EPC Contractor will therefore be required to conduct a COVID-19 Construction Risk Assessment which must be regularly updated in line with national/local (SanPin 0372-20 "Temporary sanitary rules and regulations on the organization of activities of state authorities and other organizations") and WHO requirements and guidance. | <p>Not Applicable.</p> <p>Risks associated to COVID-19 are now assessed under the Influx Impact Assessment chapter, section 31.1.1.4 Increased Risk of Communicable Diseases and Burden on Local Health Services.</p> | <p>Not Applicable.</p> <p>Risks associated to COVID-19 are now assessed under the Influx Impact Assessment chapter, section 31.1.1.4 Increased Risk of Communicable Diseases and Burden on Local Health Services.</p> | <b>Assessment of Health Risk Associated to Covid 19 has been undertaken under the Influx Impact Assessment Chapter including the applicable mitigation and monitoring requirements.</b>   |
| 33.2.1.3 | <b>Human Right Risk to Workers</b>                                   | <p>The following human right risks to workers have been assessed</p> <ul style="list-style-type: none"> <li>• Right to Work, Forced Labour;</li> <li>• Right to Adequate Standard of Living;</li> <li>• Child Labour;</li> <li>• Wages, Working Hour, Right to Rest and Retrenchment;</li> <li>• Workers Right to Health;</li> <li>• Collective Bargaining and Freedom of Association;</li> <li>• Workers Freedom of Movement.</li> </ul>   | <p>This section has been significantly updated</p> <p>See next cell for changes made to this section</p>  | <p>This section has been significantly updated</p> <p>See next cell for changes made to this section</p>  | <p><b>Based on comments received from lenders particularly EBRD, this section has now been significantly updated because it was deemed appropriate to assess project-specific impacts.</b></p> <p><b>The versions submitted in May, July and August 2022 now includes assessment of the following:</b></p> <ul style="list-style-type: none"> <li>• <b>Forced Labour;</b></li> <li>• <b>Child Labour;</b></li> <li>• <b>Lack of Worker Representation and Restriction on Trade Unions;</b></li> <li>• <b>Compulsory Overtime, Excessive Working Hours and Job Security;</b></li> <li>• <b>Provision of Inadequate Accommodation Facilities;</b></li> <li>• <b>Lack of Access to a Grievance Mechanism.</b></li> </ul> <p><b>Mitigation and monitoring measures have also been updated to be made more project-specific.</b></p> |
| 34.1     | <b>Potential Impacts, Mitigation, Management and Residual Impact</b> | The following potential impacts have been assessed: <ul style="list-style-type: none"> <li>• Increased pressure on Public Infrastructure &amp; Services;</li> </ul>   | <b>Section 31.1</b>   | <b>Section 31.1</b>   | <b>Influx impact were re-assessed to include project specific social &amp; economic risk and impacts.</b>   |

| SECTION | HEADING | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)   | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|---------|--|--|--|--|
|         |         | <ul style="list-style-type: none"> <li>- Local Economy:</li> <li>- Purchase of Goods and Services;</li> <li>- Price Inflation and Economic Vulnerability</li> <li>• Impact to Local Customs <ul style="list-style-type: none"> <li>- Disruption of Local Custom</li> <li>- Damage to Cultural Heritage</li> <li>- Increase incidence of illicit behaviour</li> </ul> </li> </ul> | <p>This section has been significantly updated</p> <p>See next cell for changes made to this section</p> | <p>This section has been significantly updated</p> <p>See next cell for changes made to this section</p> | <p><b>The versions submitted in May, July and August 2022 now includes assessment of the following:</b></p> <ul style="list-style-type: none"> <li>• <b>Social Risk;</b> <ul style="list-style-type: none"> <li>- Risk of Social Conflict;</li> <li>- Impact on Local Accommodation Facilities;</li> <li>- Increased Burden on and Competition for Public Service Provision &amp; Access;</li> <li>- Increased Risk of Communicable Diseases &amp; Burden on Local Health Services</li> <li>- Gender Based Violence &amp; Harassment</li> <li>- Disruption of Local Custom</li> <li>- Increase Incidence of Illicit Behaviour</li> <li>- Intangible Cultural Heritage</li> <li>- Increase in Traffic Risks</li> </ul> </li> <li>• <b>Local Economy;</b> <ul style="list-style-type: none"> <li>- Local Inflation of prices</li> </ul> </li> </ul> <p><b>Mitigation and monitoring measures relating to gender risks, intangible cultural heritage and traffic have also been updated to be made more project-specific and outlined in the Community chapter, Archaeology chapter and Traffic &amp; Transportation Chapter.</b></p> |

**Table 2-2 Material Changes to ESIA Volume 3 (Framework for Environmental & Social Management)**

| SECTION | HEADING  | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|--|--|--|---|--|
| 7.2     | <b>Supporting/Complimentary Plans &amp; Procedures</b> | Biodiversity Action Plan/Species Action Plan<br>Biodiversity Monitoring & Evaluation Programme (BMEP)<br>Compensation Offset Plan<br>Restoration Action Plan<br>Collision Risk Management Plan<br>Post Construction Fatality Monitoring Plan<br>Waste Management Plan<br>Occupational Health & Safety Plan<br>Emergency Preparedness and Response Plan<br>Hazardous Material Storage Plan<br>Environmental Monitoring Plan<br>Traffic & Transportation Management Plan<br>Archaeological Chance Find Procedure<br>Cultural/Archaeological Management Plan<br>Working Conditions and Terms of Employment Procedure<br>Human Resources Policy (and related Procedures)<br>Workers Accommodation Plan<br>Retrenchment Plan<br>Stakeholder Engagement Plan<br>Grievance Mechanism<br>Human Rights Policy<br>SEA & SH Prevention & Response Action Plan<br>Gender Based Violence & Harassment (GBVH) Policy<br>Security Plan<br>Community Response Action Plan<br>Worker Influx Management Plan<br>Local Content Plan<br>Decommissioning Plan | Biodiversity Action Plan/Species Action Plan<br>Biodiversity Monitoring & Evaluation Programme (BMEP)<br>Compensation Action Plan<br>Collision Risk Management Plan<br>Supply Chain Management Plan<br>Post Construction Fatality Monitoring Plan<br>Livestock Management Plan<br>Waste Management Plan<br>Occupational Health & Safety Plan<br>Emergency Preparedness and Response Plan<br>Hazardous Material Storage Plan<br>Environmental & Social Monitoring Plan<br>Traffic & Transportation Management Plan<br>Archaeological Chance Find Procedure<br>Cultural/Archaeological Management Plan<br>Working Conditions and Terms of Employment Procedure<br>Human Resources Policy (and related Procedures)<br>Workers Accommodation Plan<br>Stakeholder Engagement Plan<br>Retrenchment Plan<br>Stakeholder Engagement Plan<br>Grievance Mechanism<br>Human Rights Policy<br>SEA & SH Prevention & Response Action Plan<br>Gender Based Violence & Harassment (GBVH) Policy<br>Security Plan<br>Community Response Action Plan<br>Local Recruitment Plan<br>Influx Management Plan<br>Local Content Plan<br>Supply Chain Management Plan<br>E&S Supplier and Vendor Management Plan<br>Decommissioning Plan | Biodiversity Action Plan/Species Action Plan<br>Flora Conservation Action Plan<br>Reptile Relocation Plan<br>Breeding Birds Protection Plan<br>Biodiversity Management Plan (BMP)/Biodiversity Monitoring & Evaluation Programme (BMEP)<br>Compensation Action Plan<br>Restoration Action Plan<br>Collision Risk Management Plan<br>Post Construction Fatality Monitoring Plan<br>Livestock Management Plan<br>Waste Management Plan<br>Occupational Health & Safety Plan<br>Emergency Preparedness and Response Plan<br>Hazardous Material Storage and Management Plan<br>Environmental & Social Monitoring Plan<br>Traffic & Transportation Management Plan<br>Archaeological Chance Find Procedure<br>Cultural/Archaeological Management Plan<br>Working Conditions and Terms of Employment Procedure<br>Human Resources Policy (and related Procedures)<br>Workers Accommodation Plan<br>Stakeholder Engagement Plan<br>Retention Action Plan<br>Grievance Mechanism<br>Human Rights Policy<br>SEA & SH Prevention & Response Action Plan<br>Gender Based Violence & Harassment (GBVH) Policy<br>Community Health and Safety Management Plan<br>Security Plan<br>Community Response Action Plan<br>Local Recruitment Plan<br>Influx Management Plan<br>Local Content Plan<br>Labour Management Plan<br>Supply Chain Management Plan<br>E&S Supplier and Vendor Management Plan<br>Water Management Plan<br>Water Availability Assessment Plan<br>Contractor Management Plan<br>Decommissioning Plan | <b>The purpose and key requirements of the plans/procedures have been updated in line with the requirements within the ESIA and the lenders requirements.</b><br><b>Plans such as the Flora Conservation Action Plan, Reptile Relocation Plan have been implemented as part of the pre-construction survey requirements.</b> |
| 9       | <b>Organisational Capacity</b>                         | Not Applicable.  | Not Applicable.  | A new section on Project Developer has now been added and this includes the roles &   | <b>Based on comments received from lenders, the corporate level E&amp;S Manager and</b>  |

| SECTION | HEADING                                 | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)                         | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)          | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|---|---|---|---|--|
|         |   | See next cell for new text added to this section                    | See next cell for new text added to this section                    | responsibilities of the corporate level E&S management team (E&S Manager and Biodiversity Manager).<br>This also includes resources to manage Supply Chain Management Plan (SCMP) and respective supply chain issues.   | <b>Biodiversity Manager will be engaged to oversee the implementation of all environmental &amp; social monitoring and biodiversity monitoring and management requirements respectively.</b><br><b>Human resources will also be allocated to oversee the implementation of the SCMP.</b> |
| 10.3    | <b>Lenders Monitoring and Reporting</b> | Not Applicable.<br>See next cell for new text added to this section | Not Applicable.<br>See next cell for new text added to this section | In addition, a RAP implementation Compliance Report will be prepared prior to the commencement of works in areas impacted by involuntary resettlement (economic & physical displacement) for the Wind Farm and along the OHTL. Additional monitoring will be continued throughout the Project construction phase as per the requirements within the Project specific RAP. | <b>The RAP implementation team will prepare a RAP Compliance Report and submit it to the lenders for review following disbursement of compensation packages and prior to the commencing of works in the areas with involuntary resettlement impacts.</b>                                 |

## 2.2 Critical Habitat Assessment (CHA)

The tables below outline the material changes within the different CHA reports: Stage 1 and Stage 2. There were no material changes to Stage 2 of the CHA

**Table 2-3 Material Changes to CHA Stage 1**

| SECTION | HEADING              | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE   |
|---------|----------------------|--|--|---|---|
| 5.3     | <b>Bat Surveying</b> | Bat surveys is being undertaken via the deployment of static acoustic detectors. Complete: <ul style="list-style-type: none"><li>• 2020 Summer/Autumn: July, August, October Bat (static detector) Survey</li><li>• 2021 Spring/Summer (static detector) Survey</li><li>• April Roost Search, June Roost Search (breeding season)</li><li>• 2021 Autumn (static detector) Survey</li></ul> | Bat surveys is being undertaken via the deployment of static acoustic detectors. Complete: <ul style="list-style-type: none"><li>• 2020 Summer/Autumn: July, August, October Bat (static detector) Survey</li><li>• 2021 Spring/Summer (static detector) Survey</li><li>• April Roost Search, June Roost Search (breeding season)</li><li>• 2021 Autumn (static detector) Survey</li></ul> | Bat surveys are being undertaken via the deployment of static acoustic detectors in accordance with wind-wildlife expert guidance. The survey was designed to cover the warm season from the beginning of April to the end of October i.e., a duration of seven months. The survey was limited to the warm season based on the lack of bat activity expected within the region during the colder months. The objective of the survey was to carry out a minimum of three complete nights of acoustic recording per month between April and October giving a total of 21 nights. Based on recommendations from experts and lenders additional efforts in the form of bat roost searches complemented the bat baseline surveys.<br>Complete: <ul style="list-style-type: none"><li>• 2020 Summer/Autumn: July, August, October Bat (static detector) Survey</li><li>• 2021 Spring/Summer: April May June (static detector) Survey</li><li>• April Roost Search, June Roost Search (breeding season)</li></ul> | <b>Additional information on the bat survey undertaken for the project has been included and appropriate assessment undertaken.</b> |

**Table 2-4 Material Changes to CHA Stage 3**

| SECTION | HEADING   | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)                         | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)   | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|---|---|--|--|--|
| 2.3.1   | <b>Determining Study Area Boundaries (based on AoI/ EAAA)</b> | Not Applicable.<br>See next cell for new text added to this section | An integral part of the CHA is the appropriate delineation of study area boundaries. As the project in question is for a wind farm, it was deemed prudent to acknowledge a large area of influence (AoI) for birds and bats, with consideration of Important Bird Areas within 20km during initial screening, as well as the known migratory flyways of the region. For all other biodiversity aspects, it was considered adequate to consider the physical project boundaries as well as up to a 1km buffer zone. Thus, the Ecologically Appropriate Area of Analysis (EAAA) has been developed by assuming the AoI is no further than the 1km boundary for all WF and OHTL corridor aspects except for birds and bats. | <p>Defining the EAAA is an integral step in determining criticality. The critical thresholds must be measured against the population of the species present within the "EAAA", which on a practical level roughly translates into the full home range covered by members of the species regularly utilizing a particular area. This area should not be considered as the project boundaries itself but as the largest area of influence applicable to that species. Therefore, to determine EAAA and assess criticality, the following steps must be followed:</p> <ol style="list-style-type: none"> <li>1. Determine the largest Area of Influence for the species based on the project's identified impacts</li> <li>2. Determine the likely home range inhabited by members of the species population which utilize the area of influence. This is based on mobility and habitat distribution.</li> <li>3. The next step is calculating the estimated population present within the EAAA and comparing this to the thresholds for determination of criticality status.</li> </ol> <p>This is a relatively straight-forward concept when considering residential, sedentary populations. For example, for a terrestrial species with limited mobility and specific habitat requirements, the largest applicable area of influence would amount to the full construction footprint (as the primary concern is direct loss and disturbance during construction). Based on this, the home range regularly occupied by the population probably does not exceed a 500m buffer around the project boundaries, outside which construction activities will not take place. Therefore, the EAAA would be considered as the project boundaries and 500m buffer, but only for habitat which is considered suitable for that species. The number of individuals making up the population within that EAAA would then be compared to the critical thresholds.</p> <p>For species with extremely large home ranges, long-ranging nomadic species, and/or migratory species, this approach is difficult to utilize. For example, migrant waterbirds may be impacted on a large scale by the project as a result of macro-avoidance resulting in habitat fragmentation or migration route impacts, during the operation of the project. Or, long-distance migrant eagles which are at risk of turbine collision may be on a migratory journey of hundreds of thousands of kilometres. If we are to apply the concept of ascertaining the entire home range of the species that pass through the area of influence (let's consider a 2km buffer around the wind farm as the AoI – including all migratory birds flying through this area) then this 'EAAA' in this case could easily become an entire geographical region. The concept of EAAA in this case (for</p> | <b>EAAA was updated to better reflect an appropriate assessment methodology and align with lenders requirements.</b> |

| SECTION | HEADING                          | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|----------------------------------|---|---|---|--|
|         |                                  |   |   | <p>migratory species, particularly birds) should concentrate on identifying the likely number of individuals that may utilize the airspace of the project itself on a regular basis as part of the migratory corridor. Therefore, for EAAA for migratory birds, the project airspace itself (for both the wind farm and OHTL) has been designated as the total EAAA and the estimated population numbers have been arrived at following this logic. It is acknowledged that EAAA is not meant to be related to the project type, or activities, in its conception. It is specifically stated that EAAA should not be equated to the probability of impact on a species. We believe that following the approach outlined above still honours this as we are not only assessing the population within the AOL, but we are utilizing the worst-case AOL on a species-specific level to help define the overall total area for which the EAAA must be delineated. Criticality thresholds are then compared to the EAAA total, not the AOL total.</p> <p>Each species analysis section includes the reasoning followed to ascertain the EAAA, the likely population within the EAAA, and the final assessment of criticality</p> |  |
| 2.3.2   | <b>Population Extrapolations</b> | <p>Seasons were calculated independently to prevent over-estimation during non-migratory periods. Vantage Point calculations were then added to provide a seasonal total. For other species, regional expert surveyors were requested to provide population estimates based on survey findings and known historical and regional trends</p> | <p>Seasons were calculated independently to prevent over-estimation during non-migratory periods. Vantage Point calculations were then added to provide a seasonal total. For other species, regional expert surveyors were requested to provide population estimates based on survey findings and known historical and regional trends</p> | <p>Seasons were calculated independently to account for over-estimation during non-migratory periods. Vantage Point calculations were then added to provide a seasonal estimate of bird activity. Population extrapolation is limited by whether a species' occurrence consists only of breeding birds (which depart overwinter), or breeding birds and birds migrating to/from breeding grounds. The resulting values are likely to be over estimates which in some cases may be appropriate while in others may not provide a realistic representation of flight activity in the project area. Thus, this approach was only used for bird species considered as passage migrants. Furthermore, while the population extrapolation guided the decision-making process, a final qualitative assessment involving external expert judgement and project-based assessments was integrated into the CHA to determine CH on a case-by-case basis.</p> <p>For other species, regional expert surveyors were requested to provide population estimates based on survey findings and known historical and regional trends.</p>   | <p><b>The population extrapolation approach was revised to better reflect an appropriate assessment methodology.</b></p> |
| 3.1.2   | <b>Analysis</b>                  | <p>Not Applicable.<br/>See next cell for new text added to this section</p>   | <p>Not Applicable.<br/>See next cell for new text added to this section</p>   | <p><b>EAAA</b><br/>The total EAAA for this species has been applied as all suitable habitat within the project boundaries as well as within a 500m buffer around the wind farm. Due to the likely limited long-range mobility of the species, this is considered sufficient.</p>  | <p><b>EAAA was updated to better reflect an appropriate assessment methodology.</b></p>                                  |

| SECTION | HEADING  | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|----------|---|--|---|--|
| 3.2.2   | Analysis | Not Applicable.<br>See next cell for new text added to this section   | Not Applicable.<br>See next cell for new text added to this section  | <b>EAAA</b><br>The total EAAA for this species has been applied as all suitable habitat within the project boundaries as well as within a 5km buffer around the wind farm and OHTL. This should provide an adequate accounting of birds likely to regularly utilize the project area during breeding season.  | <b>EAAA was updated to better reflect an appropriate assessment methodology.</b>                           |
|         |          | <b>Population Extrapolation</b><br><br>The global population is 12,000-38,000 mature individuals, which means the CR/EN criticality threshold is 60 individuals. The extrapolated annual population is estimated at 210 individuals. However, the above extrapolation provides the number of birds that could potentially be recorded and does not indicate the number of individuals present in the project area. The nesting survey to date and stakeholder accounts confirm the presence of a minimum of 5 breeding pairs (reproductive units) i.e., 10 individuals in the cliffs bordering the Lake Ayakagytm.  | <b>Population Extrapolation</b><br><br>Baseline studies show that the Egyptian Vulture are present regularly in the project area, especially in summer, and have been recorded to breed in the area. The findings indicate that this species is unlikely to occur overwinter in the area. Observations made during the baseline surveys are anticipated to be multiple records of a few breeding birds rather than 76 individual birds. The nesting survey to date and stakeholder accounts confirm the presence of a minimum of 5 breeding pairs (reproductive units) i.e., 10 occurrences in the cliffs bordering the Lake Ayakagytm. This could possibly be expanded to 10 nests in total given the ambiguity of identified previous nests. | <b>The population extrapolation approach was revised to better reflect an appropriate assessment methodology.</b>   |  |
|         |          | <b>Criticality</b><br><br>As Egyptian Vulture are present regularly in the project area, especially in summer, and have been recorded to breed in the area, it is considered that Criticality is triggered for this species in the wind farm area. There was no indication of the number of reproductive units present in the survey area, however given the number of individuals recorded during the survey it is assumed that minimum reproductive unit thresholds are met. It is not considered that criticality has been triggered for the OHTL, however, it remains a priority biodiversity feature (PBF) and species of concern for which mitigation shall be addressed in the ESIA. | <b>Criticality</b><br><br>Though the Egyptian Vulture are present regularly in the project area, especially in summer, and have been recorded to breed in the area, it is considered that Criticality is not triggered for this species in the wind farm area and OHTL route. However, it remains a priority biodiversity feature (PBF) as per the EBRD PR6 GN6 criteria for which mitigation will be addressed in the ESIA.   | <b>Criticality</b><br><br>The global population is 12,400-36,000 mature individuals (Source: Birdlife Datazone; IUCN), which means the CR/EN criticality threshold is 62.5 individuals. Given that breeding bird monitoring (both previous and recent) indicates that approximately 10 breeding birds can be anticipated to regularly occur within the EAAA, a cautious estimate could be to assume an overall EAAA population of 20-40 birds. It is considered that Criticality is not triggered for this species.<br><br>However, it remains a Priority Biodiversity Feature (PBF) as per the EBRD PR6 GN6 criteria for which mitigation will be addressed in the ESIA. | <b>Updated methodology/ assessment resulted in re-assigning PBF instead of CH status for this species.</b> |
| 3.3.2   | Analysis | Not Applicable.<br>See next cell for new text added to this section   | Not Applicable.<br>See next cell for new text added to this section  | <b>EAAA</b><br>The EAAA is a difficult concept to apply to long-range migratory species, as encompassing the full geographic range of such species would result in extremely large population extrapolations. Instead, utilizing the survey baseline data, an extrapolated annual population was made which includes the airspace of the wind farm and OHTL.  | <b>EAAA was updated to better reflect an appropriate assessment methodology.</b>                           |

| SECTION | HEADING                  | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE   |
|---------|--------------------------|--|--|---|---|
|         |                          | <p><b>Population Extrapolation</b><br/>The global population is assumed to be below 37,000 pairs. The criteria threshold for endangered species, 0.5% of the global population, would be estimated as 370 individuals. The extrapolated annual population is estimated at 206 individuals.</p> <p><b>Criticality</b><br/>Although Steppe Eagle regularly occurs in the project area, it is not at abundances high enough to trigger criticality. However, the species is still to be considered as a highly important sensitive receptor. As per the EBRD PR6 GN6 criteria the species is a priority biodiversity feature (PBF), and the ESIA will include assessment of potential impacts arising from the construction and operation of the project wind farm and associated facilities, along with recommendations for management, mitigation and monitoring in line with EBRD and lender requirements and international best practice.</p> | <p><b>Population Extrapolation</b><br/>The global population is assumed to be below 37,000 pairs. The criteria threshold for endangered species, 0.5% of the global population, would be estimated as 370 individuals. The extrapolated annual population is estimated at 206 individuals.</p> <p><b>Criticality</b><br/>Although Steppe Eagle regularly occurs in the project area, it is not at abundances high enough to trigger criticality. However, the species is still to be considered as a highly important sensitive receptor. As per the EBRD PR6 GN6 criteria the species is a priority biodiversity feature (PBF), and the ESIA will include assessment of potential impacts arising from the construction and operation of the project wind farm and associated facilities, along with recommendations for management, mitigation and monitoring in line with EBRD and lender requirements and international best practice.</p> | <p><b>Population Extrapolation</b><br/>Utilizing the formula presented in Section 2.3.2, the extrapolated annual population is estimated at 206 individuals.</p> <p><b>Criticality</b><br/>The global population is assumed to be 50,000 – 75,000 mature individuals (Source: Birdlife Datazone; IUCN). Therefore, the criteria threshold for EN species, 0.5% of the global population, is 250 individuals.<br/>Although Steppe Eagle regularly occurs in the project area, it is not at abundances high enough to trigger criticality. However, the species is still to be considered as a highly important sensitive receptor.<br/>As per the EBRD PR6 GN6 criteria the species is a priority biodiversity feature (PBF), and the ESIA will include assessment of potential impacts arising from the construction and operation of the project wind farm and associated facilities, along with recommendations for management, mitigation and monitoring in line with EBRD and lender requirements and international best practice</p> | <p><b>The population extrapolation approach was revised to better reflect an appropriate assessment methodology.</b></p> <p><b>As above</b></p>           |
| 3.12    | <b>Saker Falcon</b>      | <p>A single individual was recorded during Winter 2022 VP surveying over 54 surveying hours; the extrapolated annual population therefore is 3. A conservative global population is 12,200 individuals; thus the 0.5% critical threshold would be 61 individuals.</p> <p>As per the EBRD PR6 GN6 criteria the species is a Priority Biodiversity Feature (PBF), and the ESIA will include assessment of potential impacts arising from the construction and operation of the project wind farm and associated facilities, along with recommendations for management, mitigation and monitoring in line with EBRD and lender requirements and international best practice.</p>  | <p>A single individual was recorded during Winter 2022 VP surveying over 54 surveying hours; the extrapolated annual population therefore is 3. A conservative global population is 12,200 individuals; thus the 0.5% critical threshold would be 61 individuals.</p> <p>As per the EBRD PR6 GN6 criteria the species is a Priority Biodiversity Feature (PBF), and the ESIA will include assessment of potential impacts arising from the construction and operation of the project wind farm and associated facilities, along with recommendations for management, mitigation and monitoring in line with EBRD and lender requirements and international best practice.</p>  | <p><b>3.4 Saker Falcon</b><br/>The Saker Falcon (<i>Falco cherrug</i>) is listed as Endangered on the IUCN Red List, due to a rapid population decline. It is a potential summer breeder and sometime passage migrant through Uzbekistan, going southbound in the autumn months and returning northbound in the spring months to breed in the summer months. Migrant birds generally leave their breeding grounds in September and October, returning between February and May</p>  | <p><b>The presence of Saker Falcon within the project area and analysis have been added to the report and appropriate assessment undertaken.</b></p>      |
| 3.11    | <b>White headed Duck</b> | <p>This species was not recorded during seasonal VP surveys. Winter 2022 surveys of Lake Agytma during recorded 18 individuals Although the presence of this species was confirmed at the lake, it was not recorded within the project airspace. However, as</p>   | <p>This species was not recorded during seasonal VP surveys. Winter 2022 surveys of Lake Agytma during recorded 18 individuals Although the presence of this species was confirmed at the lake, it was not recorded within the project airspace. However, as</p>   | <p><b>3.5 White Headed Duck</b><br/>The White-headed Duck (<i>Oxyura leucocephala</i>) is listed as Endangered on the IUCN Red List, due to suspected population decline.<br/>It is a passage migrant and potential winter visitor in</p>   | <p><b>The presence of White headed Duck within the project area and analysis have been added to the report and appropriate assessment undertaken.</b></p> |

| SECTION | HEADING   | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|---|---|---|---|--|
|         |   | confirmed at the lake, it was not recorded within the project airspace. However, as per the EBRD PR6 GN6 criteria the species is a Priority Biodiversity Feature (PBF).   | per the EBRD PR6 GN6 criteria the species is a Priority Biodiversity Feature (PBF).   | Uzbekistan. It begins the migration to its wintering grounds in late August and generally arrives September-October. Birds depart in February and arrive back in the breeding range by early May.   |  |
|         |   | Not Applicable.<br>See next cell for new text added to this section   | Not Applicable.<br>See next cell for new text added to this section   | <b>3.6.2 Analysis EAAA</b><br>The total EAAA for this species has been applied as all suitable habitat within the project boundaries as well as within a 10km buffer around the wind farm and OHTL. This should provide an adequate accounting of birds likely to regularly utilize the project area. | <b>EAAA was updated to better reflect an appropriate assessment methodology.</b> |
|         | <b>3.4.2 Analysis Population Extrapolation</b><br><br>The species has a global population of 33,000-67,000 mature individuals; thus, a conservative 1% estimate is 330 individuals. Considering the density at which birds were recorded during surveying, a population of approximately 40-60 adult birds is predicted for the area of influence   | <b>3.4.2 Analysis Population Extrapolation</b><br><br>The species has a global population of 33,000-67,000 mature individuals; thus, a conservative 1% estimate is 330 individuals. Considering the density at which birds were recorded during surveying, a population of approximately 40-60 adult birds is predicted for the area of influence   | <b>3.6.2 Analysis Population Extrapolation</b><br><br>The density of the males recorded in May and April is 0.022 birds/km <sup>2</sup> and 0.027 birds/km <sup>2</sup> respectively, far less than M. Koshkin's estimated density on Artemisia habitat. This difference in density is possibly due to the small sample location of the project site and shorter sampling period of the baseline survey compared to the study by M. Koshkin et al. Seasonal detectability, weather and time of sampling also have the potential to cause sampling errors. Moreover, the species is highly secretive and shy, and population underestimates are therefore highly likely.<br><br>Given the nature of this cryptic species and possible bias due to sampling size and survey period, secondary information was utilized to inform a population estimate. During the stakeholder consultation exercises, Dr. John Burnside, based on years of field study estimated the density of Asian Houbara in the project area to be 0.36 birds /km <sup>2</sup> . This area covers 2536.36 km <sup>2</sup> . Therefore, the total population within the EAAA is considered to be 913 birds | <b>The population extrapolation approach was revised to better reflect an appropriate assessment methodology.</b>   |  |
|         | <b>3.4.2 Analysis Criticality</b><br><br>The quantitative population estimation is below the proposed threshold for criticality. However, stakeholder engagement indicates that the wind farm area lies within both prime breeding ground as well as a migratory corridor. It is considered that given population extrapolation for such a secretive species has a high margin of possible error, that this species is also considered as triggering criticality for the project. | <b>3.4.2 Analysis Criticality</b><br><br>The quantitative population estimation is below the proposed threshold for criticality. However, stakeholder engagement indicates that the wind farm area lies within both prime breeding ground as well as a migratory corridor. It is considered that given population extrapolation for such a secretive species has a high margin of possible error, that this species is also considered as triggering criticality for the project. | <b>3.6.2 Analysis Criticality</b><br><br>The species has a global population of 33,000-67,000 mature individuals (Source: Birdlife Datazone; IUCN); thus, a threshold of 1% of the global population is assumed for VU species which is 330 individuals.<br>As per the CHA, this number of potential birds within the EAAA triggers criticality.  | <b>The population extrapolation approach was revised to better reflect an appropriate assessment methodology.</b>   |  |

| SECTION | HEADING                       | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|-------------------------------|---|---|---|--|
| 3.8     | <b>Eastern Imperial Eagle</b> | <p>This species was not recorded during seasonal VP surveys, although summer OHTL surveying recorded a one individual in the vicinity of the project site and two individuals were recorded during the summer nest search survey. Although the baseline surveys confirm the presence of the Eastern Imperial Eagle in the project area, it does not occur at abundances high enough to trigger criticality. However, the species is still to be considered as a highly important sensitive receptor. The Eastern Imperial Eagle is listed as Vulnerable on the IUCN Red List, therefore as per the EBRD PR6 GN6 criteria the species is a Priority Biodiversity Feature (PBF).</p>  | <p>This species was not recorded during seasonal VP surveys, although summer OHTL surveying recorded a one individual in the vicinity of the project site and two individuals were recorded during the summer nest search survey. Although the baseline surveys confirm the presence of the Eastern Imperial Eagle in the project area, it does not occur at abundances high enough to trigger criticality. However, the species is still to be considered as a highly important sensitive receptor. The Eastern Imperial Eagle is listed as Vulnerable on the IUCN Red List, therefore as per the EBRD PR6 GN6 criteria the species is a Priority Biodiversity Feature (PBF).</p>  | <p><b>3.7 Eastern Imperial Eagle</b><br/>The Eastern Imperial Eagle <i>Aquila heliaca</i> is a summer breeder and passage migrant through Uzbekistan. It is a Vulnerable (VU) species on the IUCN red list.</p>   | <p><b>The presence of Eastern Imperial Eagle within the project area and analysis have been added in the report.</b></p> |
| 3.13    | <b>Greater Spotted Eagle</b>  | <p>Two individuals were recorded during Winter 2022 VP surveying over 54 surveying hours; the extrapolated annual population therefore is 6. Current estimations of the global population are 3,900-10,000 individuals. The 1% threshold would therefore be 390 individuals. Although the baseline surveys confirm the presence of the Greater Spotted Eagle in the project area, it does not occur at abundances high enough to trigger criticality. However, the species is still to be considered as a highly important sensitive receptor. The Greater Spotted Eagle is listed as Vulnerable on the IUCN Red List, therefore as per the EBRD PR6 GN6 criteria the species is a Priority Biodiversity Feature (PBF).</p> | <p>Two individuals were recorded during Winter 2022 VP surveying over 54 surveying hours; the extrapolated annual population therefore is 6. Current estimations of the global population are 3,900-10,000 individuals. The 1% threshold would therefore be 390 individuals. Although the baseline surveys confirm the presence of the Greater Spotted Eagle in the project area, it does not occur at abundances high enough to trigger criticality. However, the species is still to be considered as a highly important sensitive receptor. The Greater Spotted Eagle is listed as Vulnerable on the IUCN Red List, therefore as per the EBRD PR6 GN6 criteria the species is a Priority Biodiversity Feature (PBF).</p> | <p><b>3.8 Greater Spotted Eagle</b><br/>The Greater Spotted Eagle, <i>Clanga clanga</i> is a passage migrant through Uzbekistan. Birds leave their breeding grounds in October and November and return in February and March. It is a Vulnerable (VU) species on the IUCN red list.</p> | <p><b>The presence of Greater Spotted Eagle within the project area and analysis have been added in the report.</b></p>  |
| 3.9     | <b>Common Pochard</b>         | <p>This species was not recorded during seasonal VP surveys. However, surveying of Lake Agytma during Winter 2021 and Winter 2022 recorded over 700 and 300 individuals, respectively. Although the presence of this species was confirmed at the lake, it was not recorded within the project airspace. The Common Pochard is listed as Vulnerable on the IUCN Red List, therefore as per the EBRD PR6 GN6</p>   | <p>This species was not recorded during seasonal VP surveys. However, surveying of Lake Agytma during Winter 2021 and Winter 2022 recorded over 700 and 300 individuals, respectively. Although the presence of this species was confirmed at the lake, it was not recorded within the project airspace. The Common Pochard is listed as Vulnerable on the IUCN Red List, therefore as per the EBRD PR6 GN6</p>   | <p><b>3.9 Common Pochard</b><br/>The Common Pochard (<i>Aythya ferina</i>) is a potential breeder in Uzbekistan. It is a Vulnerable (VU) species on the IUCN red list.</p>  | <p><b>The presence of Common Pochard within the project area and analysis have been added in the report.</b></p>         |

| SECTION | HEADING                     | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)   | JUSTIFICATION FOR MATERIAL CHANGE   |
|---------|-----------------------------|---|---|--|---|
|         |                             | criteria the species is a Priority Biodiversity Feature (PBF).  |   |  |   |
| 3.10-   | <b>Dalmatian Pelican</b>    | This species was not recorded during seasonal VP surveys. However, surveying of Lake Agytma during Winter 2022 recorded 2 individuals. Although the presence of this species was confirmed at the lake, it was not recorded within the project airspace. The Dalmatian Pelican is listed as NT on the IUCN Red List, therefore as per the EBRD PR6 GN6 criteria the species is a Priority Biodiversity Feature (PBF). | This species was not recorded during seasonal VP surveys. However, surveying of Lake Agytma during Winter 2022 recorded 2 individuals. Although the presence of this species was confirmed at the lake, it was not recorded within the project airspace. The Dalmatian Pelican is listed as NT on the IUCN Red List, therefore as per the EBRD PR6 GN6 criteria the species is a Priority Biodiversity Feature (PBF). | <b>3.10 Dalmatian Pelican</b>  | <b>The presence of Dalmatian Pelican within the project area and analysis have been added in the report.</b>          |
| 3.5     | <b>Russian Tortoise</b>     | Not Applicable.<br>See next cell for new text added to this section   | Not Applicable.<br>See next cell for new text added to this section   | <b>3.11.2 Analysis EAAA</b><br>The total EAAA for this species has been applied as all suitable habitat within the project boundaries as well as within a 5km buffer around the wind farm, as despite being a terrestrial reptile, this species has large home ranges and can be surprisingly long-ranging, especially when in search for foraging habitat.  | <b>EAAA was updated to better reflect an appropriate assessment methodology.</b>                                      |
| 3.6     | <b>Goitered Gazelle</b>     | Not Applicable.<br>See next cell for new text added to this section   | Not Applicable.<br>See next cell for new text added to this section   | <b>3.12.2 Analysis EAAA</b><br>The total EAAA for this species has been applied as within the project boundaries as well as within a 10km buffer around the wind farm, as this species has relatively large home ranges and can be considered as long-ranging.   | <b>EAAA was updated to better reflect an appropriate assessment methodology.</b>                                      |
|         |                             | <b>Population Extrapolation</b><br>Current estimations of the global population are 42,000 to 49,000 individuals. The 1% threshold would therefore be 420 individuals. The regional population is estimated at approximately 125-150 individuals.   | <b>Population Extrapolation</b><br>Current estimations of the global population are 42,000 to 49,000 individuals. The 1% threshold would therefore be 420 individuals. The regional population is estimated at approximately 125-150 individuals.   | <b>Population Extrapolation</b><br>Current estimations of the global population are 42,000 to 49,000 individuals (Source: IUCN). The assumed 1% threshold for IUCN VU species would therefore be 420 individuals. The EAAA population is estimated at approximately 125-150 individuals, based on regional expert judgement.   | <b>The population extrapolation approach was revised to better reflect an appropriate assessment methodology.</b>     |
| 3.14    | <b>Calligonum zakirovii</b> | Not Applicable.<br>See next cell for new text added to this section   | Not Applicable.<br>See next cell for new text added to this section   | Of the flora species observed during the baseline surveys, only nationally endangered species ( <i>Calligonum zakirovii</i> ) was recorded in the project area.<br><i>Calligonum zakirovii</i> is listed as a category 1 species endangered species in the Red Data Book, which corresponds to the CR/EN categories on the IUCN Red List. It is a shrub of the family Polygonaceae. The following map provides the distribution of this species in Uzbekistan and the Bhukara region | <b>The presence of <i>Calligonum zakirovii</i> within the project area and analysis have been added in the report</b> |
| 3.15    | <b>Tulipa lemanniana</b>    | Not Applicable.<br>See next cell for new text added to this section   | Not Applicable.<br>See next cell for new text added to this section   | Tulipa lemanniana is listed as a category 3 nationally red-listed species which corresponds to the VU category on the IUCN Red List. The EOO is more than 6,157,700 km <sup>2</sup> . It includes Iran, Afghanistan, Tajikistan, Kyrgyzstan, Kazakhstan, Turkmenistan and Uzbekistan. It is a shrub of the   | <b>The presence of <i>Tulipa lemanniana</i> within the project area and analysis have been added in the report.</b>   |

| SECTION | HEADING | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)   | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|---------|--|--|--|--|
|         |         |  |  | family Liliaceae. The following map provides the distribution of this species in Uzbekistan  |  |
| 5.2     | Birds   | Extrapolations of all recorded birds from the year's vantage point surveys were completed. No species (excluding the threatened species already covered in previous chapters) reached 1% of the current global population. | Extrapolations of all recorded birds from the year's vantage point surveys were completed. No species (excluding the threatened species already covered in previous chapters) reached 1% of the current global population.<br>The following migratory species with elevated conservation status at international/national levels have been designated as PBFs; Great White Pelican, Cinereous Vulture, Eurasian Griffon, Short-toed Snake Eagle, Booted Eagle and White-tailed Eagle | <p>With the exception of the Asian Houbara, none of the threatened species covered in the previous section (covering all IUCN VU or higher status birds) occur in abundances exceeding 1% of their respective global population estimates.</p> <p>The following provides a brief summary behind the rationale for the above statement.</p> <ul style="list-style-type: none"> <li>• Egyptian Vulture (1% of Global Population - 120; VP Survey Numbers – 64; Population Extrapolation – 20-40 birds),</li> <li>• Steppe Eagle (1% of Global Population – 500; VP Survey Numbers – 65; Population Extrapolation - 206),</li> <li>• Eastern Imperial Eagle (1% of Global Population – 35; VP Survey Numbers – 0),</li> <li>• Common Pochard (1% of Global Population – 7600; VP Survey Numbers – 0; Lake Survey- 700),</li> <li>• Dalmatian Pelican (1% of Global Population – 114; VP Survey Numbers – 0, Lake Survey - 2),</li> <li>• White-headed Duck (1% of Global Population – 53; VP Survey Numbers – 0, Lake Survey - 18),</li> <li>• Saker Falcon (1% of Global Population – 122; VP Survey Numbers- 1; Population Extrapolation- 10-15) and</li> <li>• Greater Spotted Eagle (1% of Global Population – 390; VP Survey Numbers- 2; Population Extrapolation- 6).</li> </ul> <p>Extrapolations of all recorded birds from the year's vantage point surveys were completed. The minimal numbers of waterbirds flying through the project airspace (Refer CHA Stage 2 for baseline findings) indicated that no species (excluding the threatened species already covered in previous chapters) reached 1% of the current global population.</p> <p>Thus for non-threatened species, the following migratory birds occur, and are considered to be PBFs, but not in abundances enough to trigger criticality (which would require over 1% of the population to be present at any one time).</p> <ul style="list-style-type: none"> <li>• Great White Pelican</li> <li>• Cinereous Vulture</li> <li>• Eurasian Griffon</li> <li>• Short-toed Snake Eagle</li> <li>• Booted Eagle</li> <li>• White-tailed Eagle</li> </ul> <p>It is worth noting here that the Lake Ayakagytmä IBA located 2km to the west of the nearest project infrastructure does have historical records (2000 and 2011) of congregatory waterbirds meeting Birdlife International criterion A4i, which is the functional equivalent criteria (&gt;1% of the population). This includes species such as Red-crested Pochard, Western Great Egret, Pygmy</p> | <p><b>The population extrapolation approach was revised to better reflect an appropriate assessment methodology.</b></p> |

| SECTION | HEADING           | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)                                 | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)                  | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE   |
|---------|-------------------|---|---|---|---|
|         |                   |   |   | <p>Cormorant, Great White Pelican, and Dalmatian Pelican. However, as discussed prior, the EAAA of migratory waterbirds has been considered to be limited to the airspace of the project itself. Therefore, the records obtained for the IBA are not considered to be applicable to the project's EAAA for those species. This is further bolstered by the extremely low occurrences of these species within the VP surveys (0 in most cases)</p>   |   |
| 5.3     | <b>Conclusion</b> | <p>Not Applicable.<br/>See next cell for new text added to this section</p> | <p>Not Applicable.<br/>See next cell for new text added to this section</p> | <p>No species triggers criticality under this criterion. However, a number of species are considered as PBFs (all nationally listed or globally listed VU species as well as species that are considered by regional stakeholders to have significant importance).</p> <ul style="list-style-type: none"> <li>• Great White Pelican</li> <li>• Cinereous Vulture</li> <li>• Eurasian Griffon</li> <li>• Short-toed Snake Eagle</li> <li>• Booted Eagle</li> <li>• White-tailed Eagle</li> </ul> | <p><b>This section has been added to provide further clarification.</b></p> |

## 2.3 Resettlement Action Plan (RAP)

The table below outline the material changes within the RAP report.

| SECTION | HEADING            | ORIGINAL TEXT (MARCH2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE   |
|---------|--------------------|---|---|---|---|
| 2.5     | Project Milestones | <p><b>LNTP:</b> 1st April 2022<br/> <b>FNTP:</b> 1st July 2022<br/> <b>WTG Installation:</b> 2nd November 2022<br/> <b>Transmission Line Construction:</b> 1st December 2022<br/> <b>Scheduled COD:</b> 31st December 2023<br/> <b>Required Project COD:</b> 31st March 2024</p>  | <p><b>LNTP:</b> 1st April 2022<br/> <b>FNTP:</b> October 2022<br/> <b>WTG Installation:</b> November 2022<br/> <b>Transmission Line Construction:</b> December 2022<br/> <b>Scheduled COD:</b> December 2023<br/> <b>Required Project COD:</b> March 2024</p>   | <p><b>LNTP:</b> July 2022<br/> <b>FNTP:</b> October 2022<br/> <b>WTG Installation:</b> March 2023<br/> <b>Transmission Line Construction:</b> August 2023<br/> <b>Early COD:</b> July 2024<br/> <b>Project COD:</b> December 2024</p>   | <p>The project milestone has been updated based on consultations between ACWA Power, NEGU and the Ministry of Energy (among other government stakeholders). In addition, the updated milestones were used to update the Resettlement Action Plan (RAP) implementation timetable.</p>  |
| 4.1.1   | Land Ownership     | <p>The Land Allotment Order (see Appendix A) issued to the Project on 19th March 2021, states that "the Deputy Mayor F.Jabbarov and Department of State Cadastre of Gijduvan district (O.Khakimov) should allocate 285.1ha land from state reserve in Baraka community in Gijduvon district for "ACWA Power Bash Wind" LLC construction of wind power plant with a capacity of 500 MW</p>   | <p>The Land Allotment Order (see Appendix A) issued to the Project on 19th March 2021, states that "the Deputy Mayor F.Jabbarov and Department of State Cadastre of Gijduvan district (O.Khakimov) should allocate 285.1ha land from state reserve in Baraka community in Gijduvon district for "ACWA Power Bash Wind" LLC construction of wind power plant with a capacity of 500 MW</p>   | <p>The SEP now includes details of the Presidential Decree of the Republic of Uzbekistan No 314 dated 8<sup>th</sup> July 2022 which includes a requirement for the Khokimiyat of the Bukhara region to ensure allocation of the land plot to the Ministry of Energy who would in turn ensure transfer of the lease to the Project Company (for the Wind Farm) and National Electric Grid of Uzbekistan – NEGU (for the OHTL). In addition, the Project exact land allocation was provided as 140.9018ha for permanent facilities and 50.65ha for temporary facilities.</p> | <p><b>The Land Allotment Order directive issued on 19<sup>th</sup> March 2021 was superseded by the issuance of the Presidential Decree No 314 dated 8<sup>th</sup> July 2022.</b><br/> <b>The update shows that the total land allocated to the Project was reduced from 285.1ha to 172.55ha based on the Project footprint (permanent &amp; temporary facilities).</b></p>        |
| 4.1.2   | Land Leases        | <p>Not Applicable.<br/> See next cell for new text added to this section</p>  | <p>The permanent land impact from the Project footprint will only account for 0.059% of the total land owned by the LLC while the temporary impact from laydown areas will account for 0.007%. Based on this, it is expected that the Project will have limited impact on Kokcha LLC (and its herders) activities and operations. In addition, these impacts are addressed in this RAP to ensure there is no impact on herders' livelihoods and their workers</p>   | <p>Based on the Presidential Decree, the permanent land impact based on the land lease issued for the lifetime of the Project, will only impact 0.053% of the land owned by the LLC while temporary impact from the laydown areas will account for 0.0034%. Based on this, it is expected that the Project will have limited impact on Kokcha LLC (and its herders) activities and operations. In addition, these impacts are addressed in this RAP to ensure there is no impact on herders' livelihoods and their workers.</p>   | <p><b>This section has been updated based on the Presidential Decree.</b><br/> <b>The assessment (based on the Presidential Decree issued on 8<sup>th</sup> July 2022) shows that the impact on land will be less than initially estimated by the use of the BoP area in the ESIA disclosed in May/July 2022.</b></p>   |
| 4.2.1   | Land Lease         | <p>ACWA Power will transfer the operation of the OHTL to NEGU after completion of the construction phase. As such, ACWA Power will only be granted land usage rights during the construction phase of the OHTL and the required land will be allocated to NEGU on a permanent basis through a government decree. It is understood from ACWA Power that the allocation of land to NEGU will be undertaken once the required land is taken into state reserve. This process is still ongoing.</p> | <p>As earlier discussed, ACWA Power will transfer the operation of the OHTL to NEGU after completion of the construction phase. As such, ACWA Power will only be granted land usage rights during the construction phase of the OHTL and the required land will be allocated to NEGU on a permanent basis through a government decree. It is understood from the Client that the allocation of land to NEGU will be undertaken once the required land is taken into state reserve. This process is still ongoing.</p> | <p>ACWA Power will transfer the operation of the OHTL to NEGU after completion of the construction phase. As such and in accordance with the Presidential Decree, ACWA Power will be granted with land usage rights and the required land will be allocated to NEGU on a permanent basis by the MoE.</p> <p>According to the Presidential Decree, the OHTL footprint will affect 0.18ha of irrigated land out of the allocated 22.62ha. In order to mitigate against this loss, the Decree</p>  | <p><b>This section has been updated based on the Presidential Decree and shows that ACWA Power will be granted with land use rights along the OHTL while NEGU will be issued with permanent land use rights.</b><br/> <b>In addition, new irrigated land will be established by the Khokimiyat of Bukhara region to compensate for the irrigated land impacted by the OHTL.</b></p> |

| SECTION | HEADING  | ORIGINAL TEXT (MARCH2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|--|---|--|---|--|
|         |  |   |  | <p>states:<br/>The Khokimiyat of Bukhara region, by the end of 2022, will ensure the development of new irrigated land plots in an amount equal to ten times the size of irrigated land plots, as well as new agricultural land equal to the area of pasture land, the land category of which is changed in accordance with this resolution</p>   |  |
| 4.3     | <b>Forest Land Along the OHTL</b>  | <p>Not Applicable.<br/>See next cell for new text added to this section</p>   | <p>Not Applicable.<br/>See next cell for new text added to this section</p>  | <p><b>Forest Land Along the OHTL</b><br/>As shown in table 4-8 above some of the land use along the OHTL is designated as forestry land. This land is found in Gijduvan, Peshku, Romitan and Jondor districts and is under the various district forestry departments. This land has been allocated to the various districts by the government for permanent use. Although not a forest in the traditional sense, the designation of land as 'forest land' is supposed to manage and further prevent desertification through planting of the saxual, Alhagi, Salsola richteri Calligonum and other desert tolerate trees and shrubs.</p>   | <p><b>This section has been added to provide information on the forest land along the OHTL route</b></p>   |
| 6.1.1   | <b>Land Requirements</b>   | <p>According to the Land Allotment Order (LAO), the Project has been allocated 285.1ha of land for the development of the Bash Wind Farm (including the WTGs, substation etc). However, it is understood from the Client that the LAO will be updated after the completion of the construction phase to only include the land under the Project footprint (in areas where the Project facilities will be sited such as the turbine pads, switching station area, access roads, storage area etc). As such, it is expected that the permanent land take will be far less than the allocated 285.1ha as further demonstrated below.</p> <p>Due to the noise health protection zone requirements for the Project (1000m from each WTG), the construction workers influx, health and safety risks, it will be necessary to resettle the herders living within the Project site, while those living outside the Project site will experience temporary access disruption in these areas during the construction phase.</p> | <p>According to the Land Allotment Order (LAO), the Project has been allocated 285.1ha of land for the development of the Bash Wind Farm (including the WTGs, substation etc). However, it is understood from the Client that the LAO will be updated after the completion of the construction phase to only include the land under the Project footprint (in areas where the Project facilities will be sited such as the turbine pads, switching station area, access roads, storage area etc). As such, it is expected that the permanent land take will be far less than the allocated 285.1ha as further demonstrated below.</p> <p>Due to the noise health protection zone requirements for the Project (1000m from each WTG), the construction workers influx, health and safety risks, it will be necessary to resettle the herders living within the Project site, while those living outside the Project site will experience temporary access disruption in these areas during the approximated 2 years of construction</p> | <p>According to the updated Presidential Decree dated 8th July 2022, the Wind Farm has been allocated 140.9018ha under land lease for the lifetime of the Project and 9.0287ha for temporary use during the construction phase of the Project.</p> <p>Due to impacts related to the noise health protection zone (1000m from each WTG during the operational phase), construction workers influx, health and safety risks and the erection of reptile fencing (during the construction phase) it will be necessary to resettle the herders living within the Project site. Those living outside the Project site will experience temporary access disruption in these areas during the approximated 2 years of construction</p> | <p><b>This change was necessitated due to the update in the Presidential Decree to show the exact footprint of the permanent and temporary project facilities.</b></p> |
| 6.1.2   | <b>Table 6-1: Land allocated to the Project based on the Presidential Decree</b> | <p><b>WTG Base:</b> 80.03ha<br/><b>Access roads:</b> 58.34ha<br/><b>Substation:</b> 20.53ha<br/><b>Laydown area:</b> 19.28</p>  | <p><b>WTG Base:</b> 80.03ha<br/><b>Access roads:</b> 58.34ha<br/><b>Substation:</b> 20.53ha<br/><b>Laydown area:</b> 19.28</p>   | <p><b>WTG Base:</b> 39.58ha<br/><b>Access roads:</b> 63.53ha<br/><b>Undergrounds cable trench:</b> 28.03<br/><b>Substation:</b> 9.76ha<br/><b>Laydown area:</b> 9.028</p>   | <p><b>The table has been updated based on the Presidential Decree and shows the exact area of project (and OHTL) footprint.</b></p>                                    |

| SECTION | HEADING   | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|---|---|---|---|--|
|         | <b>Table 6-2: Project facilities within Demarcated Grazing land</b> | <b>WTG Base, access road, substation:</b> 136.06ha<br><b>Laydown area:</b> 19.28  | <b>WTG Base, access road, substation:</b> 136.06ha<br><b>Laydown area:</b> 19.28  | <b>WTG Base, access road, substation:</b> 102.26ha<br><b>Laydown area:</b> 27.53  | <b>This shows the project facilities located with the grazing areas.</b>   |
| 6.1.4   | <b>Impacts from Reptile Fencing</b>                                 | Information on reptile fencing was not available at this point.   | Details on the reptile fencing were still being finalised.  | <p><b>Impacts from Reptile Fencing</b><br/> A Reptile Relocation Plan was prepared for the Project providing detailed instruction on the surveying and relocation methodology required to mitigate impacts on the Southern Fingered Gecko and the Russian Tortoise. The plan also includes reptile exclusion fencing for active construction areas to prevent re-entry of Russian Tortoises in the area. As a result, and to allow for the relocation of tortoises, two fences were erected in May 2022 based on the following specifications:</p> <ul style="list-style-type: none"> <li>• A minimum of 15cm into the ground;</li> <li>• 40cm height above ground; and</li> <li>• Made of material such as metal small-scaled grid, grid size not larger than 2cm *2cm.</li> </ul> <p>The two fences are approximately 10km and 28km long and will be removed at the end of the construction phase</p>   | <p><b>The impacts of the reptile fencing were assessed after its erection in May 2022. In addition, some grievances were received from herders using the site (addressed through the grievance mechanism) and as such corrective action needed to be undertaken.</b></p> <p><b>The reptile fencing will be removed at the end of the construction phase.</b></p> |
| 6.1.6   | <b>Loss of Wages</b>  | SWID and Kokcha LLC has stated that Project development will not have adverse impacts on their activities. The location of alternative land where the herders within the Project site can be resettled with their livestock was provided to herders. The herders indicated they prefer compensation to be paid and will secure alternative land themselves where they can resettle with their livestock. Based on this, it is highly unlikely that any of the herders or their workers will lose their jobs as grazing will be undertaken at alternative land. In the unlikely event of this happening, only 3 herders and their 7 workers would be impacted. | SWID and Kokcha LLC has stated that Project development will not have adverse impacts on their activities. The location of alternative land where the herders within the Project site can be resettled with their livestock was provided to herders. The herders indicated they prefer compensation to be paid and will secure alternative land themselves where they can resettle with their livestock. Based on this, it is highly unlikely that any of the herders or their workers will lose their jobs as grazing will be undertaken at alternative land. In the unlikely event of this happening, only 3 herders and their 7 workers would be impacted. | <p><b>6.1.7 Loss of Wages</b></p> <p>SWID and Kokcha LLC has stated that Project development will not have adverse impacts on their activities. The details of the location of alternative land where the herders within the Project site can be resettled with their livestock are provided in section 7.11 of this RAP for Herder 1, 3 &amp; 7. Herder 2 prefers to move outside of Kokcha LLC land approximately over 150km from the Project site where he has identified alternative grazing land. It is noted that by moving out of Kokcha LLC land, his contract with the LLC will likely be terminated (he grazes 131 sheep belonging to the LLC vs his own private livestock which include 455 sheep and 64 goats). However, the Director of the LLC has stated the final decision on whether to terminate or renew his contract will be determined once they assess his preferred relocation site.</p> <p>Based on the above, 2 out of the 3 herders with contracts with the LLC will not lose their jobs as grazing will be undertaken on the alternative identified. Impacts on herder 2 (should he lose his</p> | <p><b>This section has been updated following further consultation/engagement with PAPs.</b></p>   |

| SECTION | HEADING               | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 - EBRD AND MIGA SUBMISSION)  | UPDATED TEXT (AUGUST 2022 - ALL LENDERS)   | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|-----------------------|---|---|--|--|
|         |                       |   |   | <p>contract with Kokcha LLC) will need to be monitored in order to assess the impact on his livelihood. However, such impacts would be limited as he owns more private livestock than he grazes under Kokcha LLC.</p> <p><b>Note:</b> Herder 2 has been informed of the risks involved with moving outside of Kokcha land (Reference section 7.11.1.2) and the extent of ACWA Power's obligations in relation to the Project impacts on his livelihood and assets</p>  |  |
| 6.2.2   | <b>Impact on Land</b> | <p>Analysis shows that Commercial enterprises 1, 2, 3, 4 and 6 will lose more than 50% of their land making their enterprises unviable. As such, consultations are on-going with the Karakul District and Cadastral Dept. to identify suitable land for these PAPs. Out of the 5 PAPs, 4 have not undertaken any development on their land while 1 has existing infrastructure within their compound.</p> | <p>Analysis shows that Commercial enterprises 1, 2, 3, 4 and 6 will lose more than 50% of their land making their enterprises unviable. As such, consultations are on-going with the Karakul District and Cadastral Dept. to identify suitable land for these PAPs. Out of the 5 PAPs, 4 have not undertaken any development on their land while 1 has existing infrastructure within their compound. The owner of these Commercial enterprises has expressed concern that the loss of land will impact future income prospects and they will be penalised by the government if the land is not developed within the stipulated timeline.</p> | <p>Analysis shows that 9 of the PAPs will lose more than 10% of their land based on the defined 100m AOL. These land users are primarily in Karakul district as shown in the table above and include Farmer 5 (17.31%), Farmer 6 (11.67%), Farmer 7 (42.4%), Commercial 1 (95.83%), Commercial 2 (97.92), Commercial 3 (58.33), Commercial 4 (20%) and Commercial 6 (59.5%) including Farmer 1 (25.17%) in Shofirkon district. This represents a worst-case because the analysis is based on a 100m AOL while the permanent impact based on location of OHTL pylons will be far less and some farming and commercial activities can still be undertaken once the OHTL is constructed albeit with some restrictions. Commercial 1, 2, 3 &amp; 6 will lose more than 50% of their land making their future enterprises unviable. These pieces of land are currently undeveloped. The owners of these Commercial enterprises have expressed concern that the loss of land will impact future income prospects and they will be penalised by the government if the land is not developed within the stipulated timeline. Consultations with Bukhara Municipality to identify suitable alternative land for these PAPs have revealed that all commercial land is allocated through an online competitive auction process which the PAPs would have to individually apply to (Ref section 7.11.2 for more details). Even though the defined AOL will only impact 20% of Commercial 4, it will have a cumulative impact because almost 50% of his existing land (to the north) is unviable and would need considerable investment to be rehabilitated due to the existing topography. As such, it is assumed he would lose access to 70% of his land as</p> | <p><b>This section has been updated to elaborate on the potential impact to land along the OHTL.</b></p> |

| SECTION | HEADING   | ORIGINAL TEXT (MARCH2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)   | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|---|--|--|--|--|
|         |   |  |  | a result of the Project and topographical constraints.   |  |
| 6.2.3   | <b>Impacts on Structure</b>                                   | Not Applicable.<br>See next cell for new text added to this section  | Not Applicable.<br>See next cell for new text added to this section  | Physical displacement along the OHTL will impact Herder 3 and Farmer 4 who have accommodation structures within the 30m HPZ while Commercial 4 has a security room that is sometimes used by the security guard for accommodation purposes but is approximately 49m from the OHTL and as such outside of the 30m HPZ. The impacts on Herder 1, Farmer 1, Commercial 3 and 5 will be economic and will not lead to physical displacement  | This section has been updated to show the physical displacement impacts of the OHTL and how many PAPs will be impacted.<br>This update was undertaken following additional consultations with impacted PAPs along the 100m OHTL AOL. |
| 6.2.5   | <b>Impacts on Businesses: Taxes and Penalties</b>             | Not Applicable.<br>See next cell for new text added to this section  | Not Applicable.<br>See next cell for new text added to this section  | <b>Note:</b> Civil works/installation activities in areas with impacts on assets, crops and trees (belonging to herders, farmers and commercial entities) will be conditional to the implementation of this RAP. Such work can commence in areas without impact prior to completion of the RAP implementation.   | <b>This update makes it clear that no civil works/installations will be undertaken in areas with assets/crops/trees etc until the RAP has been implemented.</b>  |
| -       | -   | Not Applicable.<br>See next cell for new text added to this section  | Not Applicable.<br>See next cell for new text added to this section  | <b>6.2.9 Impacts on Forest Land Impacts on Forest Land</b><br><br>The impacts on forest land are expected to be minimal and based on the OHTL footprint. In addition, no trees were recorded within the 100m AOL. The EPC Contractor will be required to restore the habitat after the completion of the construction phase in accordance with ESIA requirements   | <b>The RAP now has a requirement for restoration of habitat along the OHTL after completion of construction phase.</b>   |
| 6.3     | <b>Summary of Physical Displacement &amp; Economic Impact</b> | Not available  | Not available  | A table has been added showing the impacts, type of impacts (temporary & permanent) and the number of PAPs who will be impacted under each impact.   | <b>Even though the number of PAPs remain the same as the RAP disclosed in May/July 2022, the updated RAP provides a summary of impacts and the number of PAPs.</b>   |
| 7.5     | <b>Valuation Verification</b>                                 | The inventory and valuation process has been conducted by LLC Evaluation Consulting Centre (Gulistan Bohalash Kansalting) who are licensed by the Republic State Committee for Privatization and Development of Competition. The valuator has been involved in the inventory and valuation of all assets within the Project site and along the OHTL. | The inventory and valuation process has been conducted by LLC Evaluation Consulting Centre (Gulistan Bohalash Kansalting) who are licensed by the Republic State Committee for Privatization and Development of Competition. The valuator has been involved in the inventory and valuation of all assets within the Project site and along the OHTL. | The inventory and valuation process has been conducted by LLC Evaluation Consulting Centre (Gulistan Bohalash Kansalting) who are licensed by the Republic State Committee for Privatization and Development of Competition. The valuator has been involved in the inventory and valuation of all assets within the Project site and along the OHTL. The valuation calculations will be disclosed to the PAPs who will have the right to contest the valuation. In case any of the PAPs disagree with the valuation, this will trigger a validation of the inventory and another valuation if considered necessary. This would be undertaken at no cost to the PAPs. | <b>All PAPs will have the right to contest valuation amounts through the established grievance mechanism.</b>  |

| SECTION  | HEADING  | ORIGINAL TEXT (MARCH2022 - ADB SUBMISSION)  | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE  |
|----------|--|---|--|---|--|
| 7.6.2    | OHTL   | The finalisation of the OHTL compensation packages is still on-going and will be updated in this RAP and to the PAPs once completed.  | The finalisation of the OHTL compensation packages is still on-going and will be updated in this RAP and to the PAPs once completed.   | The compensation costs for each category (based on the defined 100m AOL) are presented within the updated RAP to show compensation to PAPs along the OHTL for fixed assets, crops, trees and land auction costs and for workers.  | <b>The finalisation of the OHTL compensation packages necessitated this update.</b>  |
| 7.8.2    | OHTL   | Consultation with the vulnerable household along the OHTL route as identified in Section 5.2.12 is ongoing and the support to be provided to this household will be updated in the RAP and to the PAPs once completed.  | Consultation with the vulnerable household along the OHTL route as identified in Section 5.2.12 is ongoing and the support to be provided to this household will be updated in the RAP and to the PAPs once completed.   | Support to vulnerable households is provided in table 7-9 of the updated RAP based on consultations undertaken with vulnerable households to identify their areas of need/support.  | <b>Table 7-9 have been added to the RAP to outline the support that will be provided to vulnerable households along the OHTL based on need basis.</b>  |
| 7.10-    | RAP Contingency Fund   | ACWA Power will put aside UZS 300 million as a contingency sum to cater for additional future costs that may arise during the implementation of the RAP. It is noted that where the unanticipated impacts identified during the Project implementation exceed the amounts allocated to the contingency fund, compensation will still be provided at full replacement cost | ACWA Power will put aside UZS 300 million as a contingency sum to cater for additional future costs that may arise during the implementation of the RAP. It is noted that where the unanticipated impacts identified during the Project implementation exceed the amounts allocated to the contingency fund, compensation will still be provided at full replacement cost  | ACWA Power will put aside UZS 300 million as a contingency sum to cater for additional future costs that may arise during the implementation of the RAP within the wind farm and UZS 50 million for the OHTL (even if NEGU will take over the operation of the OHTL in order to ensure the lenders requirements are met). It is noted that where the unanticipated impacts identified during the Project implementation exceed the amounts allocated to the contingency fund, compensation will still be provided at full replacement cost. | <b>A contingency fund for the OHTL has been set up to ensure anticipated impacts are addressed in accordance with the lenders' requirements.</b>   |
| 7.11.1.1 | Availability of Suitable Replacement Land – Wind Farm                      | Consultations on available alternative land were still on-going at this stage.  | 3 potential relocation sites were identified through consultation with Kokcha LLC in Sarsen-Kura, Bukanay and Fozilbek. After site visits the 3 herders with structures within the project site rejected these sites due to various reasons such as unsuitable weather, existing land users etc. At this stage the 3 herders stated that they wanted to receive cash and they would identify suitable alternative land for themselves. Kokcha LLC confirmed that the 4 herders from Ayakagitma village can graze on the land north of their village without any contractual obligations or fees. | Further consultations were undertaken with the 3 herders in order to identify their preferred alternative land. 2 herders identified land within Kokcha land (outside of the project boundary). The two locations were confirmed by the head of Kokcha LLC and this was communicated to the herders. One herder decided to relocate outside of Kokcha LLC land (he was informed to choose land within Kokcha LLC territory) and he was informed of the potential risks to his livelihood since he would lose security of tenure.            | <b>This update shows that the project has provided support to herders in identifying alternative land (confirmed by Kokcha LLC) in order to ensure their livelihoods are not negatively impacted by the project.</b>   |
| 7.11.1.3 | Availability of Suitable Replacement Land – OHTL<br>7.11.2 Commercial Land | Data collection and consultations were still being undertaken at this stage.  | Consultations were undertaken with Bukhara Municipality in order to identify suitable alternative commercial land for five commercial enterprises. It was determined that commercial land is allocated through competitive on-line auction process which all PAPs will need to individually apply for. 4 out of the 5 PAPs stated that they prefer cash compensation while one stated they would like land.  | After further consultations with Bukhara Municipality, the PAP who preferred to receive alternative land instead of cash compensation was informed that this was not possible due to the existing online competitive process that each PAP must apply to.   | <b>This change shows that the project undertook consultations with all the relevant stakeholders to identify suitable commercial land. The entitlement matrix requires these PAPs to be supported in the event they are not able to secure suitable commercial land.</b> |

| SECTION | HEADING  | ORIGINAL TEXT (MARCH2022 - ADB SUBMISSION)   | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)   | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)   | JUSTIFICATION FOR MATERIAL CHANGE   |
|---------|--|--|--|--|---|
| 7.14    | Table 7-13: Summary of Total Costs Associated with RAP | Compensation for trees & crops: TBD<br>Compensation for structures along the OHTL: TBD<br>Compensation to businesses: TBD<br>Compensation for grazing land & forest fund: TBD  | Compensation for trees & crops: TBD<br>Compensation for structures along the OHTL: TBD<br>Compensation to businesses: TBD<br>Compensation for grazing land & forest fund: TBD  | Compensation for trees: 149,574,952<br>Compensation for crops: 59,335,943<br>Compensation for structures along the OHTL: 237,358,416<br>Compensation to businesses: 1,024,215,219  | Cost for the compensation for trees, crops, structures along the OHTL and businesses have been included.  |
| 7.15    | Payment of Compensation Packages                       | ACWA Power RAP implementation team will be responsible for contacting all the PAPs on the compensation payment requirements such as submission of legal identification details, bank accounts etc.                                     | ACWA Power RAP implementation team will be responsible for contacting all the PAPs on the compensation payment requirements such as submission of legal identification details, bank accounts etc.   | ACWA Power RAP implementation team will be responsible for contacting all the PAPs on the compensation payment requirements such as submission of legal identification details, bank accounts etc. Upon completion of the disbursement of compensation packages, the RAP implementation team will prepare a RAP Compliance Report and submit it to the lenders for review prior to the commencing of works in the sections/components with involuntary resettlement impacts.   | <p>This section has been updated to include the need for the RAP implementation team to prepare RAP Compliance report prior to commencement of works in IR areas at the WF &amp; along the OHTL.</p> <p>This report will be submitted to the lenders.</p>               |
| 8.3     | RAP Disclosure Meeting                                 | Not Applicable.<br>See next cell for new text added to this section  | Not Applicable.<br>See next cell for new text added to this section  | RAP disclosure meetings were held as part of the wider ESIA public disclosure meetings held from 26th June to 5th July 2022 following approval from the Bukhara Regional Municipality. The meetings included presentation of the Project and distribution of brochures which summarised key project impacts, where to find the project materials and details of the grievance mechanism. The summary of the outcome of the disclosure meetings with the PAPs at the Bash WF and along the OHTL are provided in the RAP | <b>Outcome of the RAP Disclosure meetings with the PAPs have now been included in the report.</b>   |
| 9.3     | Institutional Responsibility - ACWA Power              | This section did not include any obligations for ACWA Power to monitor impacts along the OHTL during the operational phase which will be undertaken by NEGU.   | This section did not include any obligations for ACWA Power to monitor impacts along the OHTL during the operational phase which will be undertaken by NEGU.   | Since NEGU will be in charge of the OHTL operational phase, ACWA Power will be required to close any gaps between the national requirements (which NEGU will adhere to) and lenders requirements and ensure that the OHTL contingency fund is in place.  | <b>This update was necessitated in order to ensure that the livelihoods of PAPs along the OHTL operational phase (which will be under NEGU) will not be negatively affected.</b>  |
| 11      | Monitoring & Reporting                                 | This version did not include requirement for monitoring productivity impacts for the 3 herders with structures outside of the project site or monitoring for commercial enterprises losing more than 50% of their land along the OHTL. | This version did not include requirement for monitoring productivity impacts for the 3 herders with structures outside of the project site or monitoring for commercial enterprises losing more than 50% of their land along the OHTL.                       | The RAP requires for monitoring of productivity impacts for the 3 herders with structures outside of the project site and monitoring for commercial enterprises losing more than 50% of their land along the OHTL to be undertaken.  | <b>This was updated in order to ensure monitoring is undertaken for PAPs with structures outside of the WF and commercial enterprises along the OHTL. This will ensure that their livelihoods are not negatively impacted and that corrective action is undertaken.</b> |
| 11.2    | Internal Monitoring                                    | N/A  | The monitoring period for the implementation of the RAP will be for 2 years. During this period ACWA Power/Project Company will submit quarterly monitoring reports to the lenders. Any additional monitoring will be determined by the lenders based on the | The monitoring period for the implementation of the RAP will be undertaken during the entire construction phase of the Project. The monitoring will also include unanticipated physical & economic displacement impacts during the construction phase including grievances arising and corrective actions  | <b>The update provides more robust internal monitoring requirements and a provision for the monitoring reports to be disclosed on the lenders websites.</b>   |

| SECTION | HEADING | ORIGINAL TEXT (MARCH2022 - ADB SUBMISSION) | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION) | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE |
|---------|---------|--|--|---|-----------------------------------|
|         |         |  | outcome of the close-out audit at the end of year 2.       | taken. During this period ACWA Power/Project Company will submit quarterly monitoring reports to the lenders. Any additional monitoring will be determined by the lenders based on the outcome of the close-out audit at the end of the construction phase. The monitoring reports will be disclosed on the respective lenders' websites. |                                   |

## 2.4 Stakeholder Engagement Plan (SEP)

The table below outline the material changes within the SEP report.

| SECTION | HEADING                               | ORIGINAL TEXT (MARCH2022 - ADB SUBMISSION)                          | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION)          | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)  | JUSTIFICATION FOR MATERIAL CHANGE  |
|---------|---------------------------------------|---|---|---|--|
| 5.4     | ESIA Public Disclosure                | Not Applicable.<br>See next cell for new text added to this section | Not Applicable.<br>See next cell for new text added to this section | ESIA disclosure meetings were held as part of the wider ESIA public disclosure meetings held from 26 <sup>th</sup> June to 5 <sup>th</sup> July 2022 following approval from the Bukhara Regional Municipality. The meetings included presentation of the Project and distribution of brochures which summarised key project impacts, where to find the project materials and details of the grievance mechanism. The summary of the outcome of the disclosure meetings with the PAPs at the Bash WF and along the OHTL are provided in the SEP | <b>Following disclosure of the ESIA package online (lenders website and ACWA Power's website), public disclosure meetings were held with local communities, PAPs, NGOs, etc. and the outcome of the meeting have been summarised in this section of the SEP.</b> |
| 5.4.1   | Wind Farm                             | Not Applicable.<br>See next cell for new text added to this section | Not Applicable.<br>See next cell for new text added to this section | <b>UPDATED TEXT – SEPTEMBER 2022</b><br><br>The ESAP required additional consultation to be undertaken regarding tangible and intangible cultural heritage, workforce influx and access road at the Wind Farm area. Based on this, community members from Ayakagitma village, Chulobod village and Kuklam village were asked about the tangible cultural heritage, worker influx and access road during the public disclosure of the ESIA.  | <b>The outcome of the consultation regarding tangible and intangible cultural heritage, workforce influx and access road at the wind farm area have been summarised in the SEP</b>   |
| 5.4.2   | OHTL                                  | Not Applicable.<br>See next cell for new text added to this section | Not Applicable.<br>See next cell for new text added to this section | <b>UPDATED TEXT – SEPTEMBER 2022</b><br><br>The ESAP required additional consultation to be undertaken regarding tangible and intangible cultural heritage, workforce influx and access road along the OHTL. During the public disclosure of the ESIA, representatives of Municipalities along the OHTL route were asked about the intangible and tangible cultural heritage while PAPs along the route were asked about worker influx and access road  | <b>The outcome of the consultation regarding tangible and intangible cultural heritage, workforce influx and access road along the OHTL route have been summarised in the SEP</b>  |
| 6.2.1   | Update on Disclosure of ESIA document | Not Applicable.<br>See next cell for new text added to this section | Not Applicable.<br>See next cell for new text added to this section | Website links to the disclosed ESIA documents on EBRD, ADB, MIGA and ACWA Power's website has been provided   | <b>This section has been updated to include the link to the ESIA package documents disclosed on EBRD, ADB, MIGA and ACWA Power's website</b>   |
| 7.8     | Process Flow and Timeline             | Not Applicable.   | Not Applicable.   | In addition, where a solution has been provided to a grievance/complaint and the grievant is not satisfied  | <b>This section has been updated to include the type of external grievance mechanism that</b>  |

| SECTION | HEADING | ORIGINAL TEXT (MARCH 2022 - ADB SUBMISSION)      | ORIGINAL TEXT (MAY & JULY 2022 – EBRD AND MIGA SUBMISSION) | UPDATED TEXT (AUGUST 2022 – ALL LENDERS)   | JUSTIFICATION FOR MATERIAL CHANGE                    |
|---------|---------|--|--|--|--|
|         |         | See next cell for new text added to this section | See next cell for new text added to this section           | with the proposed solution, the grievant can take the dispute resolution mechanism outside of the company/Project grievance mechanism. An example of such external grievance mechanism will be the people's "Reception Office" established in accordance with the Law of the Republic of Uzbekistan 'Regarding appeals of individuals and legal entities' No 378 dated 3.12.2014 (with amendments on 17 <sup>th</sup> August 2017). The people's 'Reception Office' is tasked with ensuring the functioning of an effective system of appeals aimed at the full protection of citizens' rights, freedoms and legitimate interests. Any applications are considered within 15 days from date of receipt and any additional consideration is completed within 1 month. | <b>can be accessed in accordance with Uzbek law.</b> |

## 3 CONCLUSIONS

The review and assessment of the material changes in the EISA package documents shows that there is no increase in the risks/impacts from the Project and the OHTL.

Several of the risks/impacts identified in the documents disclosed in March, May and July 2022 have been reduced through the implementation of additional and more robust mitigation measures to be implemented by the Project parties throughout the life of the project. Key measures include the requirement and commitment to a site wide SDOD for the Bash WF, establishment of a 2km buffer zone between the Lake Ayakagitma and the nearest WTG and Micrositing of WTGs to ensure that they are at least 750m away from known raptor nests etc.

In addition, some of the risks/impacts were assessed in more details following the finalisation of the project Balance of Plant (BoP) i.e., location of accommodation facilities, laydown areas and batching plant etc. The updated ESIA (August 2022) provides the mitigation and management measures for the corresponding impacts.